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July 1, 2014

**Via Hand Delivery**

Ms. Marlene Dortch  
Federal Communications Commission  
445 12th Street SW  
Washington, D.C. 20554

Re: FCC Form 481 - High-Cost Support Information and Low-Income Support Information  
Pursuant to 47 C.F.R. §§ 54.313(a)-(g) and 54.422(a)

Dear Secretary Dortch:

Pursuant to 47 C.F.R. §§ 54.313(a)-(g) and 54.422(a) of the Federal Communication Commission's regulations, please find enclosed the FCC Form 481 for OTZ Telephone Cooperative, Inc. This form was also filed at the Regulatory Commission of Alaska (RCA) and USAC.

OTZ Telephone Cooperative, Inc. seeks confidential treatment for its financial information pursuant to the Protective Order, Connect America Fund, et al., WC Docket No. 10-90 et al., (Nov. 16, 2012). A redacted version is also being filed this date via the FCC's Electronic Comment Filing System. In addition, attached is a letter requesting confidential treatment under 47 C.F.R. §§ 0.457 and 0.459 of the initial § 54.202(a) Five-Year Service Quality Improvement Plan.

Please do not hesitate to contact me if you have any questions or I may be of any assistance.

Sincerely,

**DYKEMA GOSSETT PLLC**

Shannon M. Heim  
4000 Wells Fargo Center  
90 South Seventh Street  
Minneapolis, MN 55402  
Phone (612) 486-1586  
Fax: (855) 223-7059  
Email: sheim@dykema.com

SMHE/ebf

**REDACTED – FOR PUBLIC INSPECTION**



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Ms. Marlene Dortch, Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington, D.C. 20554

Re: FCC Form 481 - High-Cost Support Information and Low-Income Support Information  
Pursuant to 47 C.F.R. §§ 54.313(a)-(g) and 54.422(a)

Dear Ms. Dortch:

Pursuant to the Protective Order in *Connect America Fund, et al.*, WC Docket No. 10-90 *et al.* (Nov. 16, 2012) and 47 C.F.R. §§ 0.457 and 0.459, OTZ Telephone Cooperative, Inc., by its attorneys, hereby requests that certain materials and information be withheld from public inspection. Specifically, OTZ Telephone Cooperative, Inc. request confidential treatment of the Five-Year Service Quality Improvement Plan (the "Plan") attached to its Form 481 filing.

In support of its request for confidential treatment and pursuant to the requirements under 47 C.F.R. § 0.459(b), OTZ Telephone Cooperative, Inc. states the following:

*1. Identification of the specific information for which confidential treatment is sought.*

OTZ Telephone Cooperative, Inc. seeks confidential treatment of the Plan attached to the Form 481 filing accompanying this letter. The Plan contains sensitive financial information about OTZ Telephone Cooperative, Inc. as well as information about OTZ Telephone Cooperative, Inc.'s projected network improvements and upgrades for voice and broadband services during the period from 2015 through 2019.

*2. Identification of the Commission proceeding in which the information was submitted or description of the circumstances giving rise to the submission.*

The documents are being submitted as part of the annual Eligible Telecommunications Carrier ("ETC") Report (Form 481) mandated by 47 C.F.R. § 54.313.

Ms. Marlene Dortch, Secretary  
July 1, 2014  
Page 2

3. *Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged.*

The data described is highly confidential and sensitive commercial and financial information which constitutes trade secrets or sensitive commercial and financial information that would “customarily be guarded from competitors”<sup>1</sup> and is therefore exempted from mandatory disclosure under FOIA Exemption 4 and 47 C.F.R. § 0.457(d).<sup>2</sup>

4. *Explanation of the degree to which the information concerns a service that is subject to competition.*

The Plan relates to voice and broadband services provided by OTZ Telephone Cooperative, Inc. that are subject to competition from competitive local exchange carriers, cable television system operators, electric power utilities, fixed and mobile wireless service providers, and/or satellite carriers.

Specifically, the Plan sets forth in detail the services provided by OTZ Telephone Cooperative, Inc. over its existing network including location of customers, as well as planned network improvement and maintenance for 2015 through 2019, including project dates, populations impacted by the improvements and upgrades, and projected capital costs associated with maintaining the network. This information is competitively sensitive information related to the company’s existing network and planned upgrades and maintenance, and would benefit OTZ Telephone Cooperative, Inc.’s competitors if they were able to have access to this information.

5. *Explanation of how disclosure of the information could result in substantial competitive harm.*

Disclosure of the Plan is likely to result in substantial competitive harm to OTZ Telephone Cooperative, Inc. because the Plan could provide competitors with commercially sensitive insights related to OTZ Telephone Cooperative, Inc.’s operations, service offerings, and costs.

6. *Identification of any measures taken by the submitting party to prevent unauthorized disclosure.*

OTZ Telephone Cooperative, Inc. does not make the Plan or any of the information contained therein publically available in any way. The Plan is only made available to key

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<sup>1</sup> 47 C.F.R. § 0.457(d)(2).

<sup>2</sup> 5 U.S.C. § 522(b)(4).





Ms. Marlene Dortch, Secretary  
July 1, 2014  
Page 3

employees with a direct need-to-know basis. This production has been completed by outside counsel.

7. *Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties.*

OTZ Telephone Cooperative, Inc. does not make the Plan available to the public and it has not previously allowed disclosure of the Plan to third parties that are not otherwise bound by confidentiality obligations.

8. *Justification of the period during which the submitting party asserts that the material should not be available for public disclosure.*

The Plan should be treated as confidential for an indefinite period, as OTZ Telephone Cooperative, Inc. will always be subject to competition and the competitive harms associated with the disclosure of the Plan.

9. *Any other information that the party seeking confidential treatment believes may be useful in assessing whether its request for confidentiality should be granted.*

None.

In order to provide adequate protection from public disclosure, OTZ Telephone Cooperative, Inc. requests that the Commission strictly limit distribution of the Plan within the Commission on a "need to know" basis and not allow any distribution outside of the Commission. In the event that any person or entity outside of the Commission requests disclosure of the Plan, OTZ Telephone Cooperative, Inc. requests that it be so notified immediately so that it can oppose such request or take other action to safeguard its interests as it deems necessary and appropriate.

Please do not hesitate to contact me if you have any questions or I may be of any assistance.

Sincerely,

**DYKEMA GOSSETT PLLC**

Shannon M. Heim  
SMHE/eb1



FCC Form 481 - Carrier Annual Reporting Data Collection Form		FCC Form 481 OMB Control No. 3050-0086/OMB Control No. 3050-0019 July 2013
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<010> Study Area Code	613019
<015> Study Area Name	OTZ TEL COOPERATIVE
<020> Program Year	2015
<030> Contact Name: Person USAC should contact with questions about this data	Douglas A. Neal
<035> Contact Telephone Number: Number of the person identified in data line <030>	907421000 ext.
<039> Contact Email Address: Email of the person identified in data line <030>	dneal@otz.net

ANNUAL REPORTING FOR ALL CARRIERS		54,313 Completion Required	54,422 Completion Required
		(check box when complete)	
<100> Service Quality Improvement Reporting	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<200> Outage Reporting (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210> <input type="checkbox"/> <- check box if no outages to report		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<300> Unfulfilled Service Requests (voice)	0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<310> Detail on Attempts (voice)	<input type="text"/> (attach descriptive document)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<320> Unfulfilled Service Requests (broadband)	0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<330> Detail on Attempts (broadband)	<input type="text"/> (attach descriptive document)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<400> Number of Complaints per 1,000 customers (voice)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<410> Fixed	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420> Mobile		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<430> Number of Complaints per 1,000 customers (broadband)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<440> Fixed	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<450> Mobile	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<500> Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510> 613019ak510.pdf	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600> Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610> 613019ak610.pdf	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700> Company Price Offerings (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<710> Company Price Offerings (broadband)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<800> Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900> Tribal Land Offerings (Y/N)?	(if yes, complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1000> Voice Services Rate Comparability	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1010> <input type="text"/>	(attach descriptive document)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<1100> Terrestrial Backhaul (Y/N)?	(if not, check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1110> <input type="text"/>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1200> Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet</b>			
<2000> Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers	(check to indicate certification)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<2005> <input type="text"/>	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet</b>			
<3000> <input type="text"/>	(check to indicate certification)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<3005> <input type="text"/>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

(100) Service Quality Improvement Reporting  
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	613019
<015>	Study Area Name	OTZ TEL COOPERATIVE
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Douglas A. Neal
<035>	Contact Telephone Number - Number of person identified in data line <030>	9074421000 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dneal@otz.net
<110>	Has your company received its ETC certification from the FCC?	(yes / no) <input type="radio"/> <input checked="" type="radio"/>
<111>	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?	(yes / no) <input type="radio"/> <input type="radio"/>

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

- <112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

613019sk112.pdf

Name of Attached Document

Please check these boxes below to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

- <113> Maps detailing progress towards meeting plan targets  
 <114> Report how much universal service (USF) support was received  
 <115> How (USF) was used to improve service quality  
 <116> How (USF) was used to improve service coverage  
 <117> How (USF) was used to improve service capacity  
 <118> Provide an explanation of network improvement targets not met in the prior calendar year.

✓
✓
✓
✓
✓
✓

<010>	Study Area Code	613019
<015>	Study Area Name	022 TEL COOPERATIVE
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Douglas A. Neal
<035>	Contact Telephone Number - Number of person identified in data line <030>	9074421000 ext.
<038>	Contact Email Address - Email Address of person identified in data line <030>	dneal@txx.net

— See attached worksheet —



<010>	Study Area Code	613019
<015>	Study Area Name	OT2 TEL COOPERATIVE
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Douglas A. Neal
<035>	Contact Telephone Number - Number of person identified in data line <030>	9074421000 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dneal@otc.net

[illegible]

(710) Broadband Price Offerings  
Data Collection Form 10-1-13

<010>	Study Area Code	812019
<015>	Study Area Name	CRZ TEL COOPERATIVE
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Douglas A. Neal
<035>	Contact Telephone Number - Number of person identified in data line <030>	8074431000 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dneal-bots.net

[illegible]

<010>	Study Area Code	513019
<015>	Study Area Name	OTS TEL COOPERATIVE
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Douglas A. Neal
<035>	Contact Telephone Number - Number of person identified in data line <030>	9074421000 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dneal@ots.net
<810>	Reporting Carrier	OTS Telephone Cooperative, Inc.
<811>	Holding Company	
<812>	Operating Company	

REDACTED - FOR PUBLIC INSPECTION



(900) Tribal Lands Reporting  
Data Collection Form

NECC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010> Study Area Code	613019
<015> Study Area Name	OTR TEL COOPERATIVE
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Douglas A. Seal
<035> Contact Telephone Number - Number of person identified in data line <030>	9074421000 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	dseal@otr.net

&lt;910&gt; Tribal Land(s) on which ETC Serves

State of Alaska


&lt;920&gt; Tribal Government Engagement Obligation

613019ak920.pdf

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select (Yes, No, NA)
Yes

Yes
Yes
Yes
Yes
Yes
Yes
Yes

<b>(1100) No Terrestrial Backhaul Reporting</b>		FCC Form 481
<b>Data Collection Form</b>		OMB Control No. 3050-0986/OMB Control No. 3060-0819
		July 2013

<010>	Study Area Code	613019
<015>	Study Area Name	OTZ TEL COOPERATIVE
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Douglas A. Neal
<035>	Contact Telephone Number - Number of person identified in data line <030>	9074421000 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dneal@otz.net

Please check this box to confirm no terrestrial backhaul  
 <1120> options exist within the supported area pursuant to § 54.313(G)



Please check this box to confirm the reporting carrier offers  
 <1130> broadband service of at least 1 Mbps downstream and 256 kbps  
 upstream within the supported area pursuant to § 54.313(G)



(1200) Terms and Condition for Lifeline Customers	FCC Form 481
Lifeline Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	613019
<015>	Study Area Name	OTZ TEL COOPERATIVE
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Douglas A. Neal
<035>	Contact Telephone Number - Number of person identified in data line <030>	9074421000 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dneal@otz.net

613019ak1210.pdf
------------------

Name of Attached Document

<1220> Link to Public Website [HTTP](http://)

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, ☒
- <1222> Details on the number of minutes provided as part of the plan, ☒
- <1223> Additional charges for toll calls, and rates for each such plan. ☒



(2000) Price Cap Carrier Additional Documentation	FCC Form 487
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers	July 2013

<010>	Study Area Code	613019
<015>	Study Area Name	OTZ TEL COOPERATIVE
<020>	Program Year	2013
<030>	Contact Name - Person USAC should contact regarding this data	Douglas A. Neal
<035>	Contact Telephone Number - Number of person identified in data line <030>	9074421000 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dneal@otz.net

CHECK the boxes below to note compliance as a recipient of incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e) the information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting		
<2010>	2nd Year Certification (47 CFR § 54.313(b)(1))	<input type="checkbox"/>
<2011>	3rd Year Certification (47 CFR § 54.313(b)(2))	<input type="checkbox"/>
Price Cap Carrier Receiving Frozen Support Certification (47 CFR § 54.312(a))		
<2012>	2013 Frozen Support Certification	<input type="checkbox"/>
<2013>	2014 Frozen Support Certification	<input type="checkbox"/>
<2014>	2015 Frozen Support Certification	<input type="checkbox"/>
<2015>	2016 and future Frozen Support Certification	<input type="checkbox"/>
Price Cap Carrier Connect America ICC Support (47 CFR § 54.313(d))		
<2016>	Certification Support Used to Build Broadband	<input type="checkbox"/>
Connect America Phase II Reporting (47 CFR § 54.313(e))		
<2017>	3rd year Broadband Service Certification	<input type="checkbox"/>
<2018>	5th year Broadband Service Certification	<input type="checkbox"/>
<2019>	Interim Progress Certification	<input type="checkbox"/>
<2020>	Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.	<input type="checkbox"/>
<2021>	Interim Progress Community Anchor Institutions	

Name of Attached Document Listing Required Information

[3000] Date Of Return Carrier Additional Documentation		CCF Form 345
Data Collection Form		OMB Control No. 3060-0885/OMB Control No. 3060-0819
		July 2015

<010>	Study Area Code	613019
<015>	Study Area Name	OTZ TEL COOPERATIVE
<018>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Douglas A. Neal
<035>	Contact Telephone Number - Number of person identified in data line <030>	9074421000 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dneal@otz.net

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

- (3010) Progress Report on 5 Year Plan  
Milestone Certification (47 CFR § 54.313(f)(1)(i))

Name of Attached Document Listing Required Information

- (3011) Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(i), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

☐

- (3012) Community Anchor Institutions (47 CFR § 54.313(f)(1)(i))

Name of Attached Document Listing Required Information

- (3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))  
(3014) If yes, does your company file the RUS annual report

(Yes/No)  
(Yes/No)

☒ ☒

Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

- (3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)

☒

- (3016) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

☒

- (3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation

613019ak3017.pdf

Name of Attached Document Listing Required Information

- (3018) If the response is no on line 3014, is your company audited?

(Yes/No)

☒ ☒

If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

- (3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications

☐

- (3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

☐

- (3021) Management letter issued by the independent certified public accountant that performed the company's financial audit.

☐

If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

- (3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers.

☐

- (3023) Underlying information subjected to a review by an independent certified public accountant

☐

- (3024) Underlying information subjected to an officer certification.

☐

- (3025) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

☐

- (3026) Attach the worksheet listing required information

Name of Attached Document Listing Required Information

Certification - Reporting Carrier Data Collection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010> Study Area Code	613019	
<015> Study Area Name	OTZ TEL COOPERATIVE	
<020> Program Year	2015	
<030> Contact Name - Person USAC should contact regarding this data	Douglas A. Neal	
<035> Contact Telephone Number - Number of person identified in data line <030>	9074421000 ext.	
<039> Contact Email Address - Email Address of person identified in data line <030>	dneal@otz.net	

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	OTZ TEL COOPERATIVE
Signature of Authorized Officer:	CERTIFIED ONLINE Date 06/26/2014
Printed name of Authorized Officer:	Doug Neal
Title or position of Authorized Officer:	CEO
Telephone number of Authorized Officer:	9074421000 ext.
Study Area Code of Reporting Carrier:	613019 Filing Due Date for this form: 07/01/2014
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	



Certification - Agent / Carrier Data Collection Form		FCC Form 481 OMB Control No. 3060-0086/OMB Control No. 3060-0819 July 2013
<010> Study Area Code	613019	
<015> Study Area Name	OTL TEL COOPERATIVE	
<020> Program Year	2015	
<030> Contact Name - Person USAC should contact regarding this data	Douglas A. Neal	
<035> Contact Telephone Number - Number of person identified in data line <030>	9074421000 ext.	
<039> Contact Email Address - Email Address of person identified in data line <030>	dneal@otl.net	

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent: _____	
Name of Reporting Carrier: _____	
Signature of Authorized Officer: _____	Date: _____
Printed name of Authorized Officer: _____	
Title or position of Authorized Officer: _____	
Telephone number of Authorized Officer: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier: _____	
Name of Authorized Agent or Employee of Agent: _____	
Signature of Authorized Agent or Employee of Agent: _____	Date: _____
Printed name of Authorized Agent or Employee of Agent: _____	
Title or position of Authorized Agent or Employee of Agent: _____	
Telephone number of Authorized Agent or Employee of Agent: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

## Attachments

(200) Service Outage Reporting (Voice) Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
--	--

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	613019
<015>	Study Area Name	OTZ TEL COOPERATIVE
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Douglas A. Neal
<035>	Contact Telephone Number - Number of person identified in data line <030>	9074421000 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dneal@otz.net
<220>		

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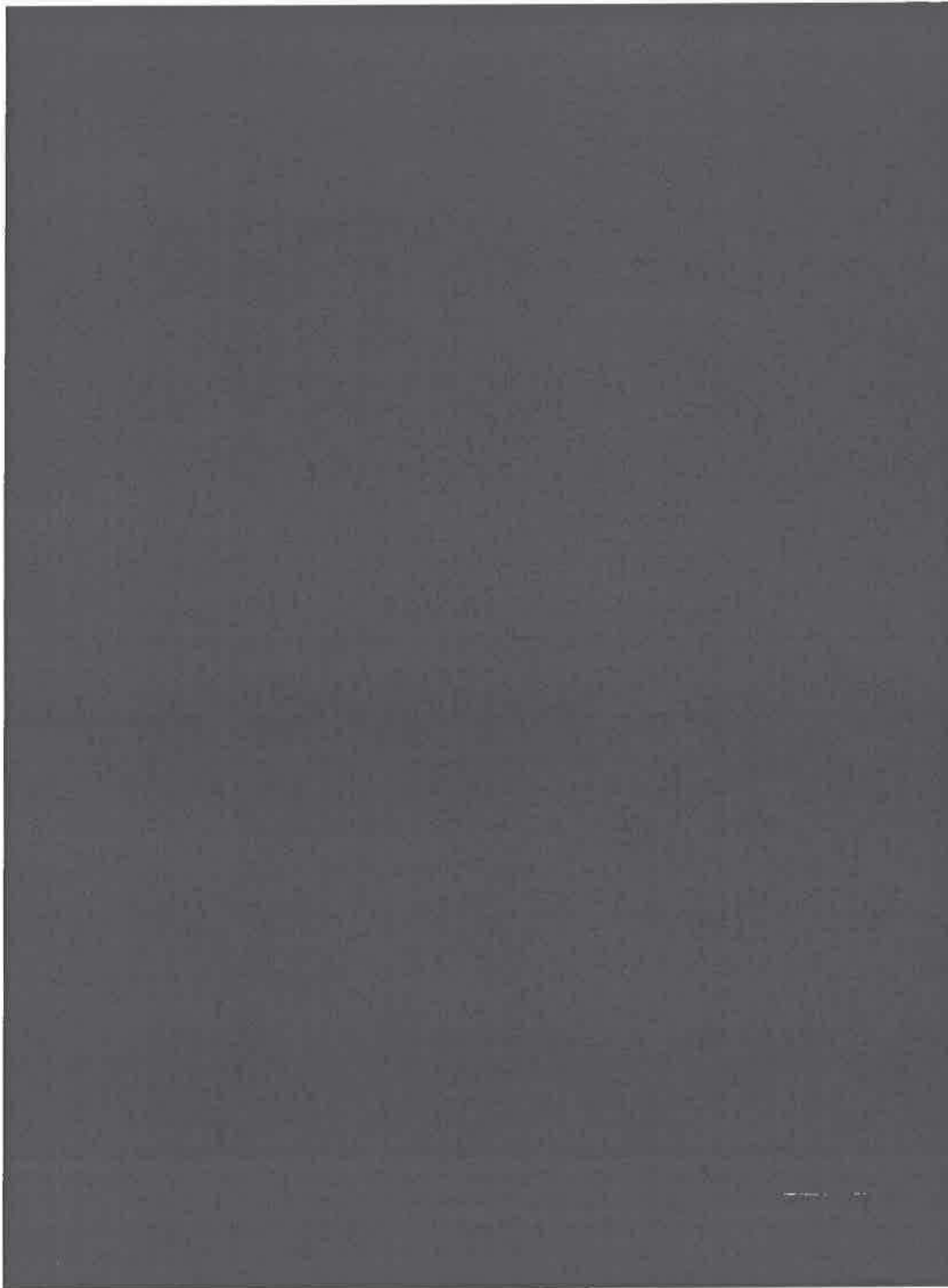
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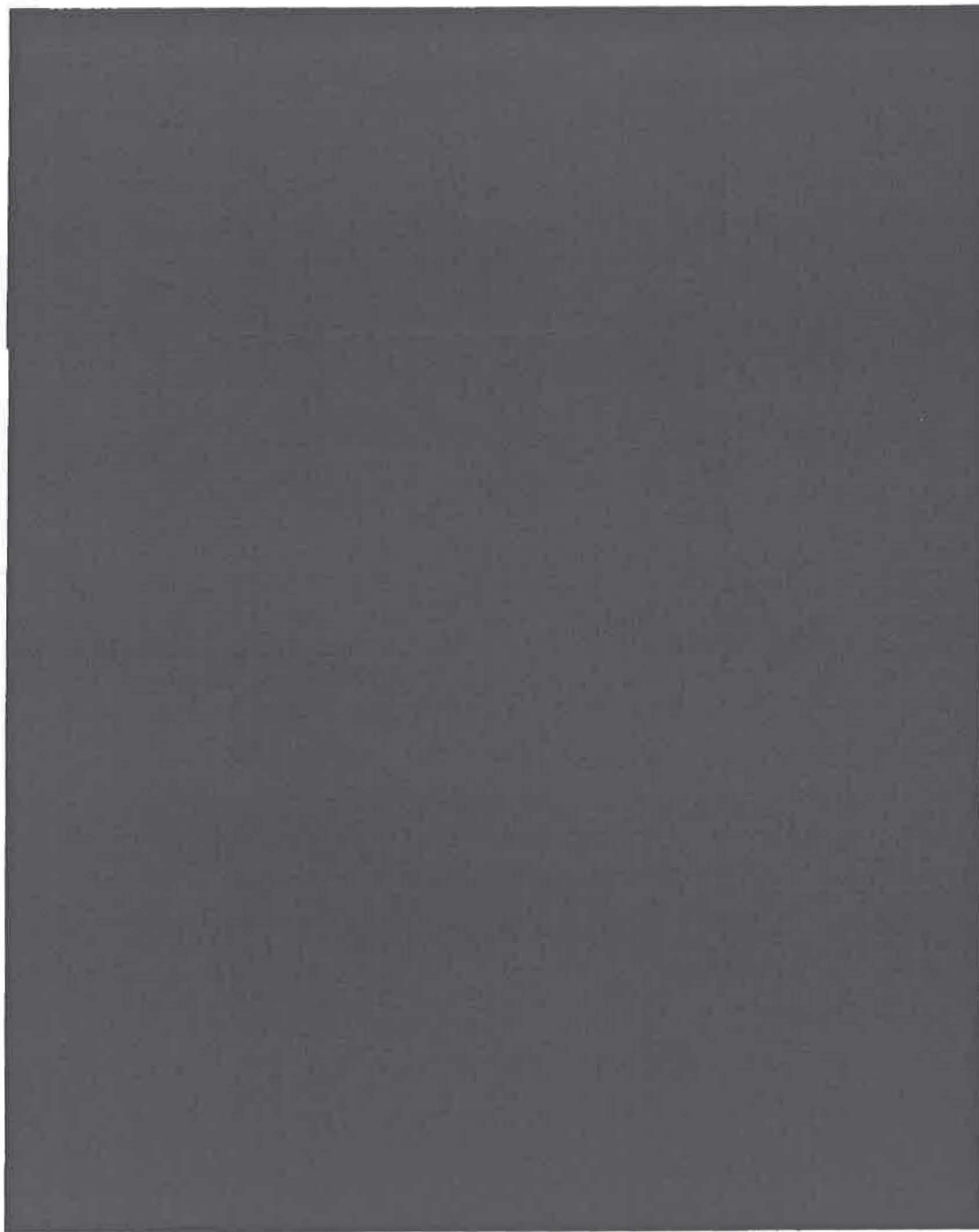
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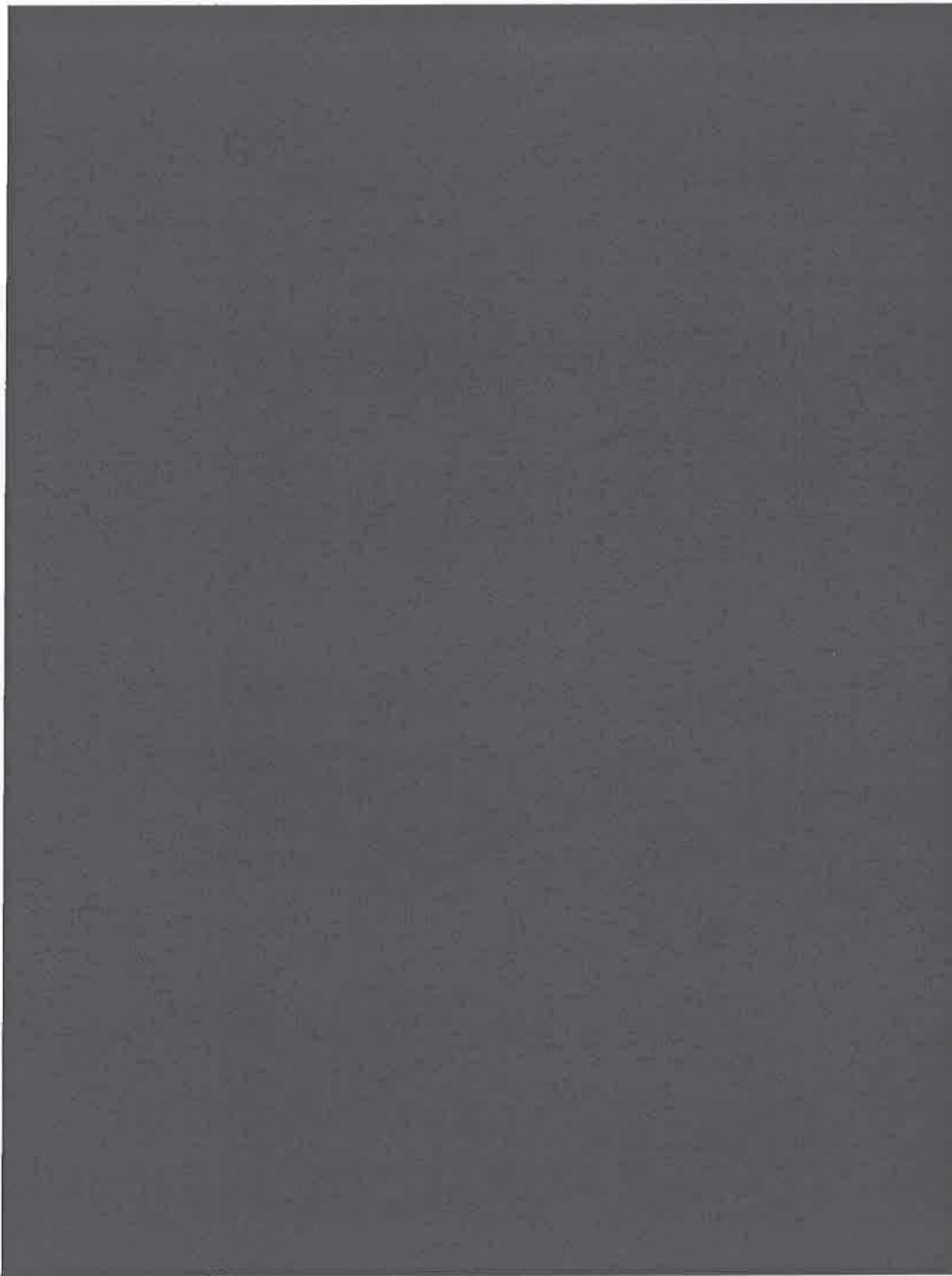
## Attachments

**OTZ Telephone Cooperative, Inc.**  
**FIVE YEAR SERVICE QUALITY IMPROVEMENT PLAN**

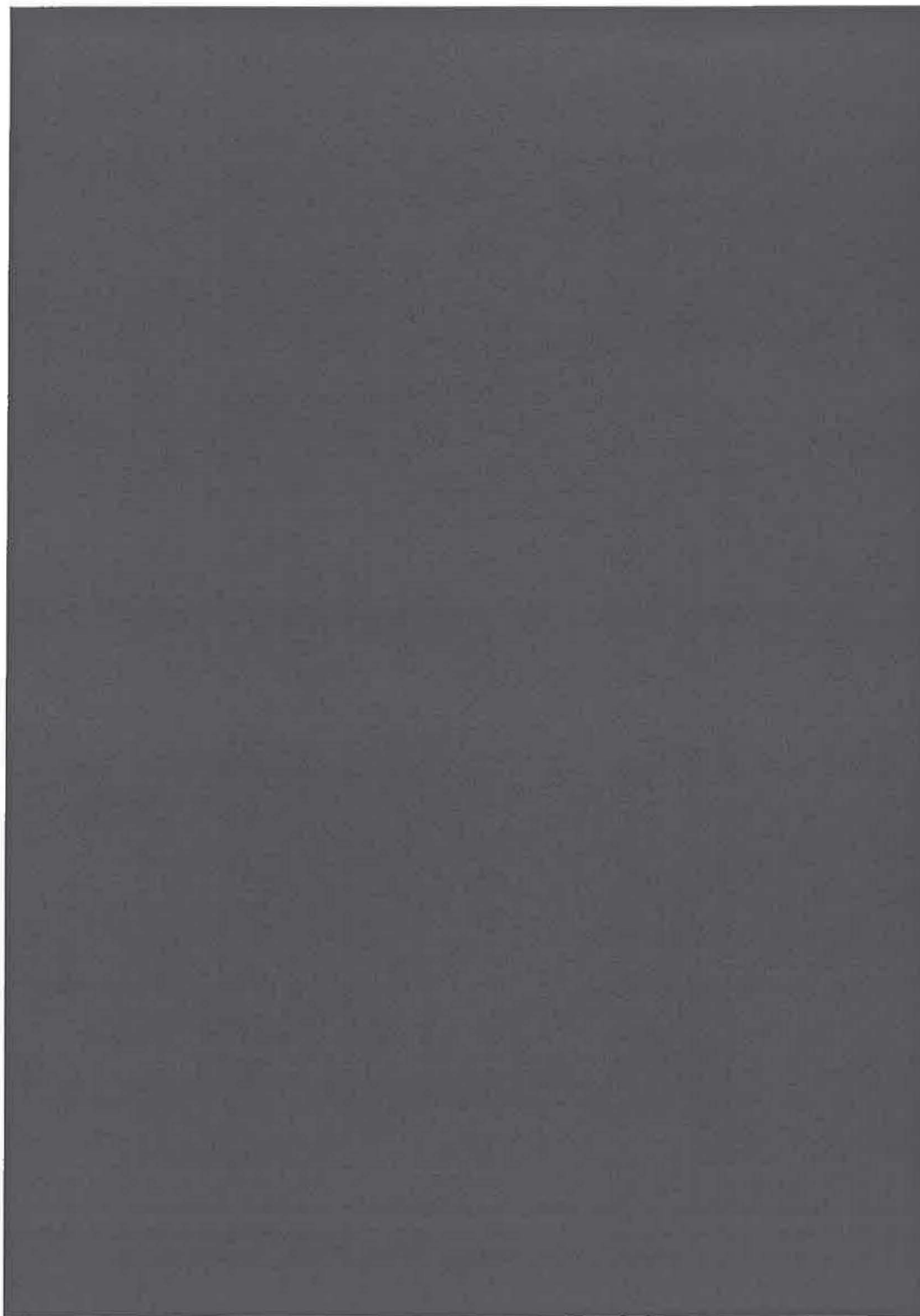


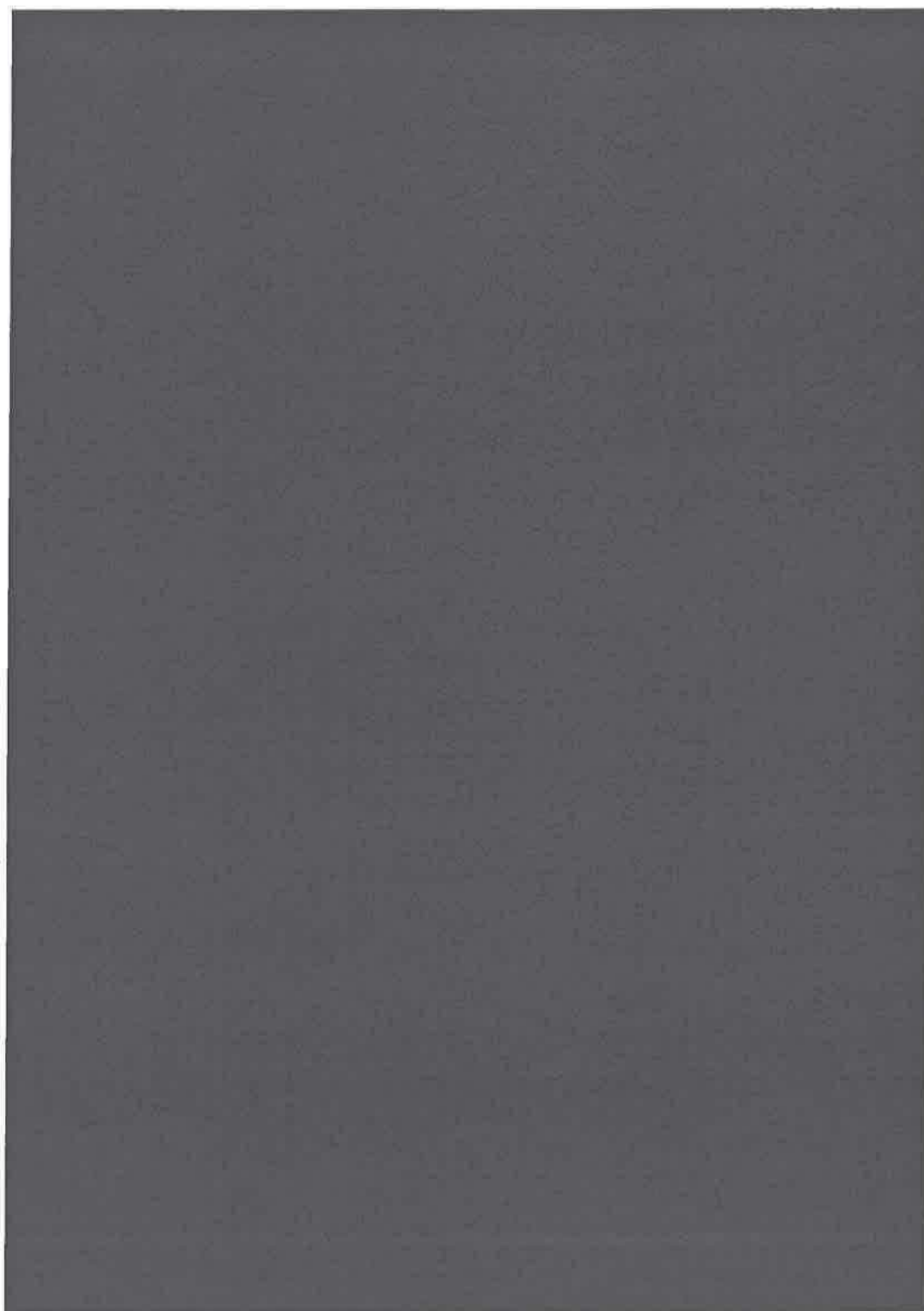






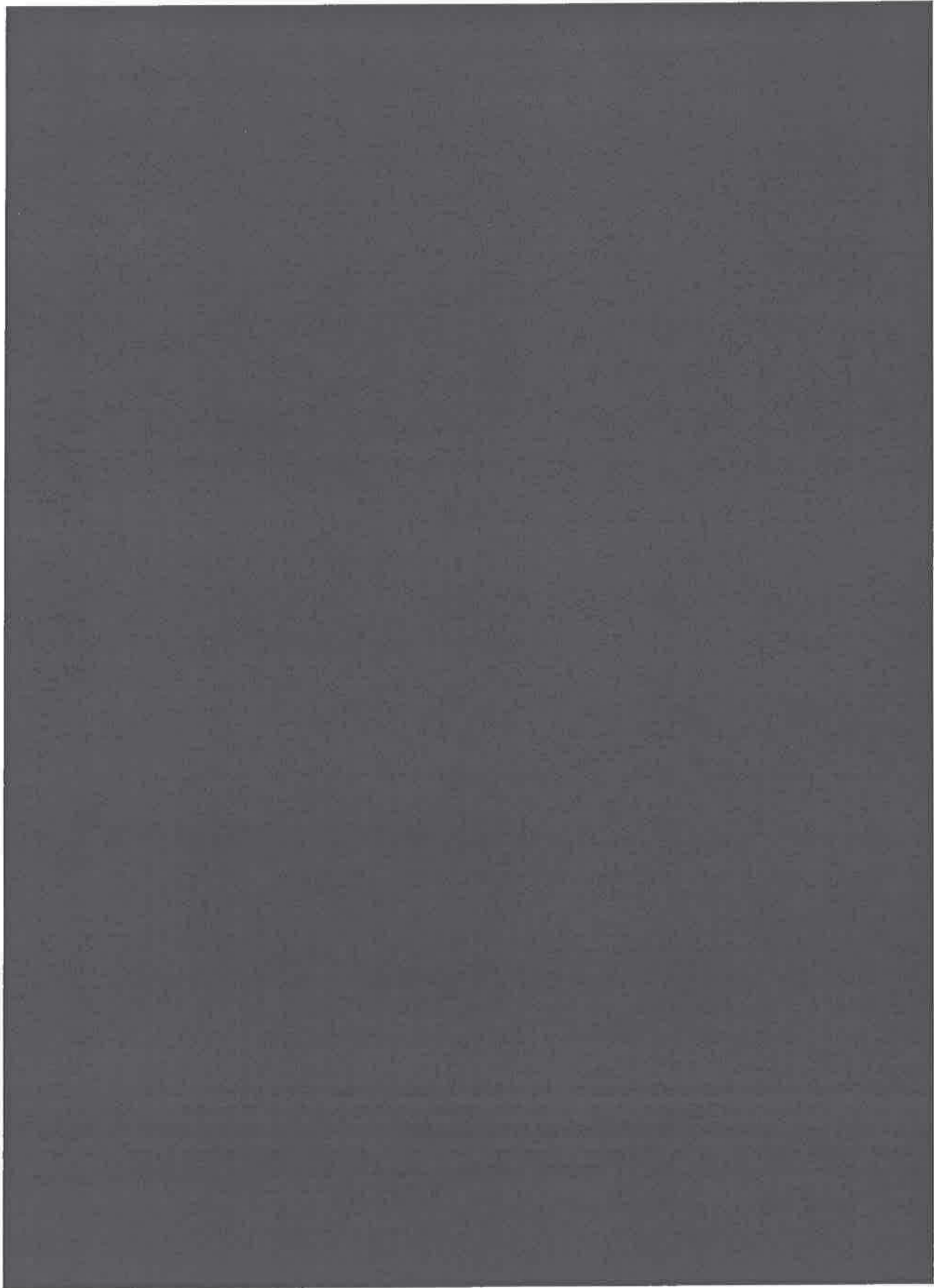
OTZ Telecommunications Cooperative, Inc. SAC 613019  
Page 3 of 6

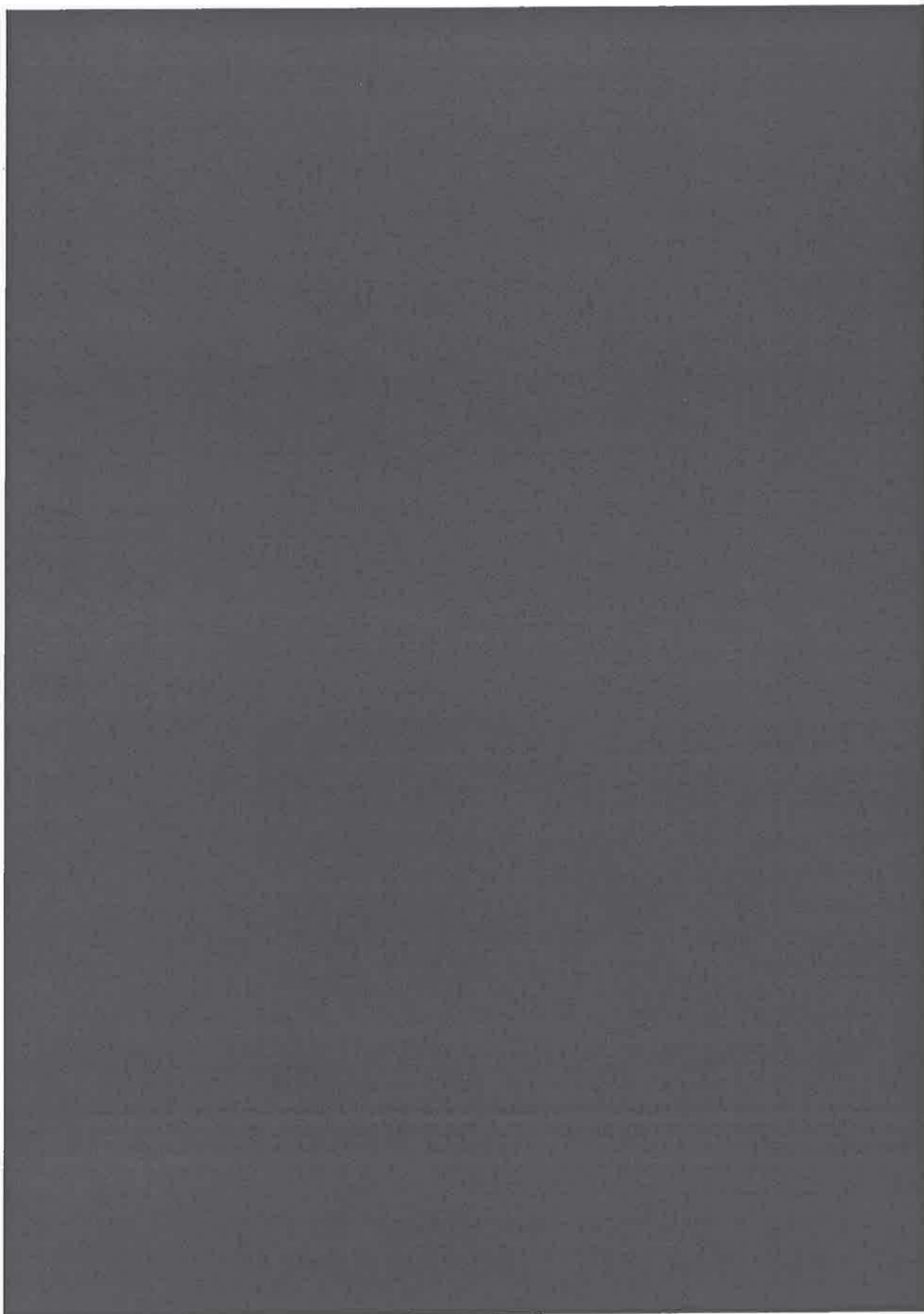






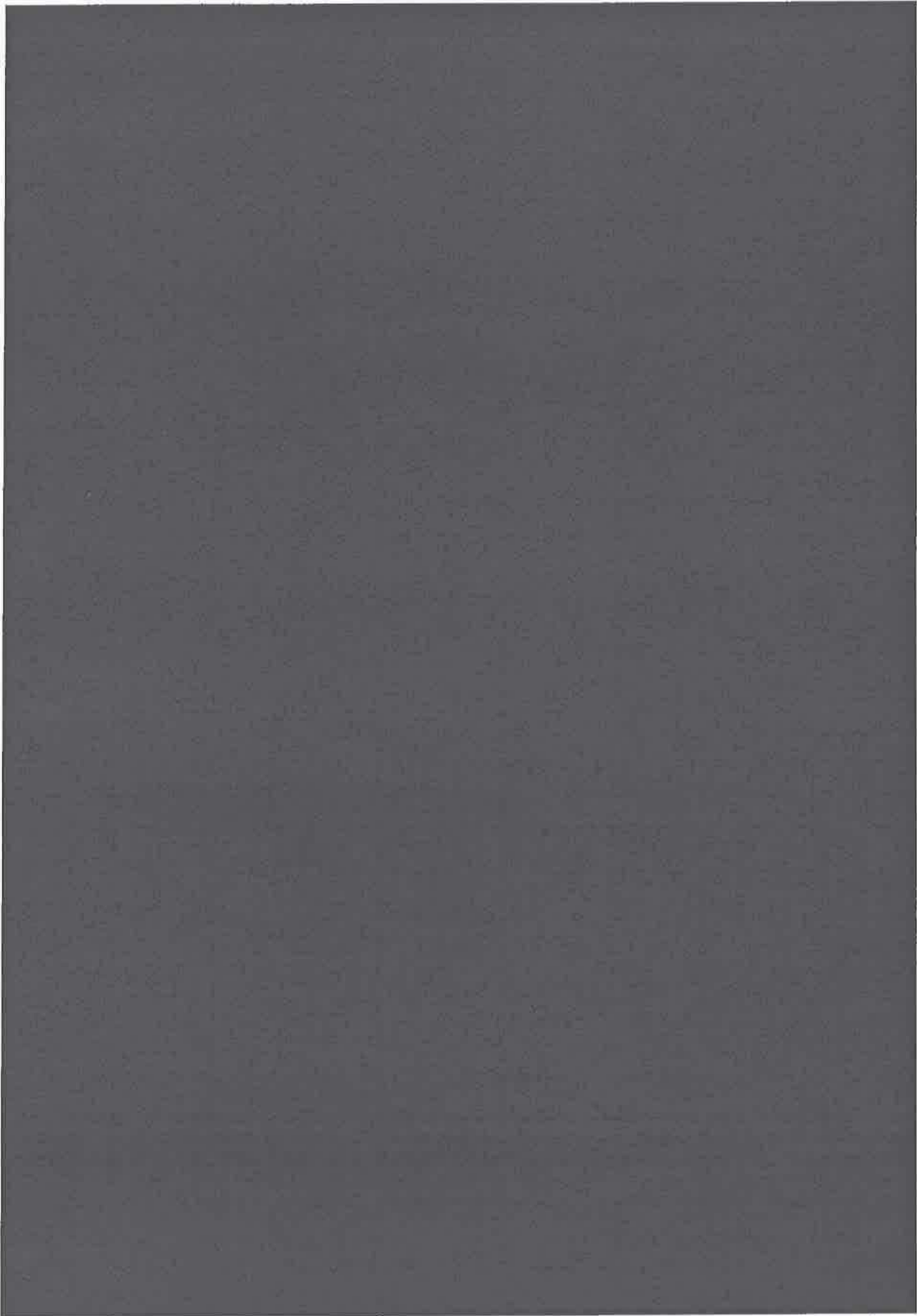




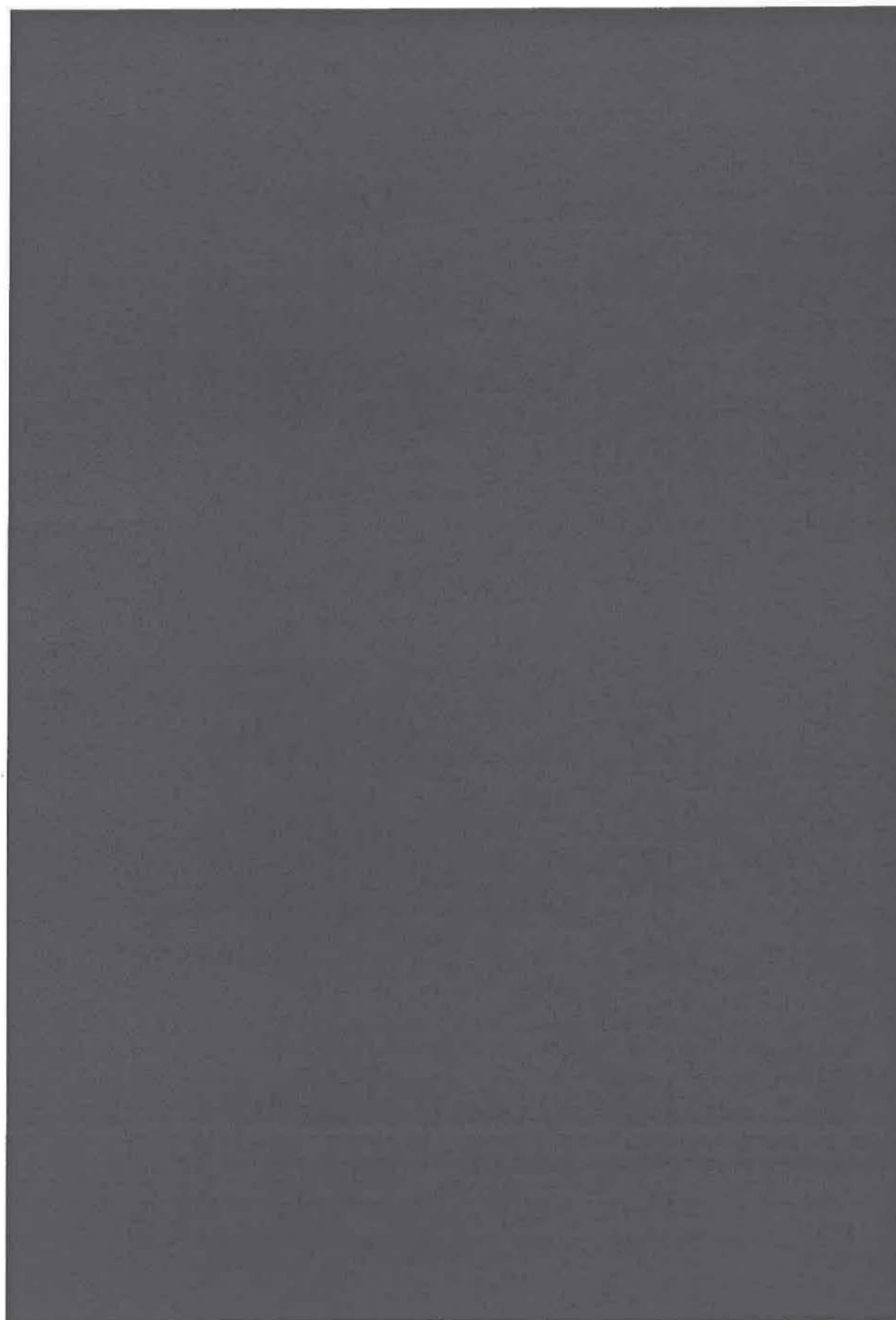


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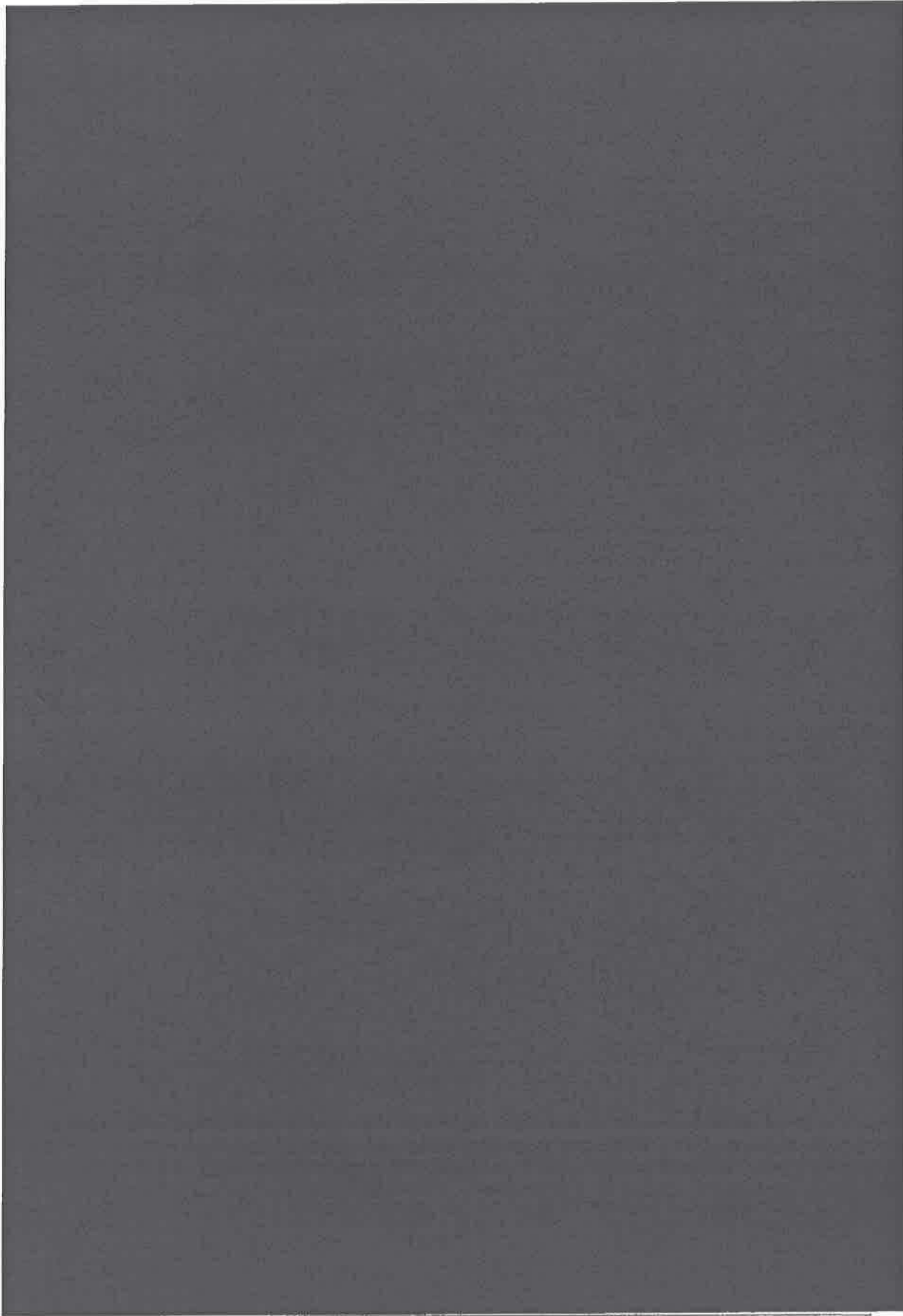




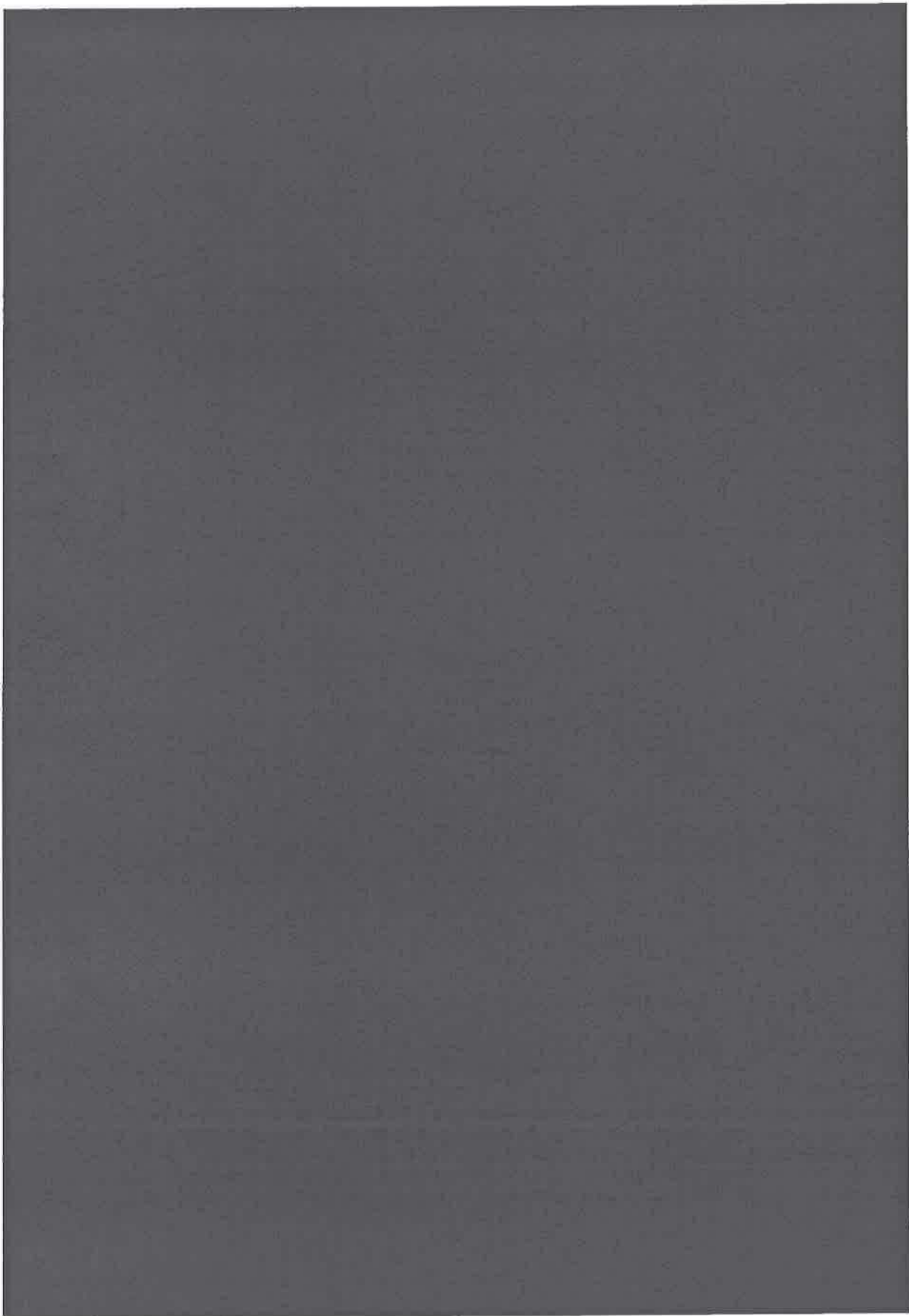
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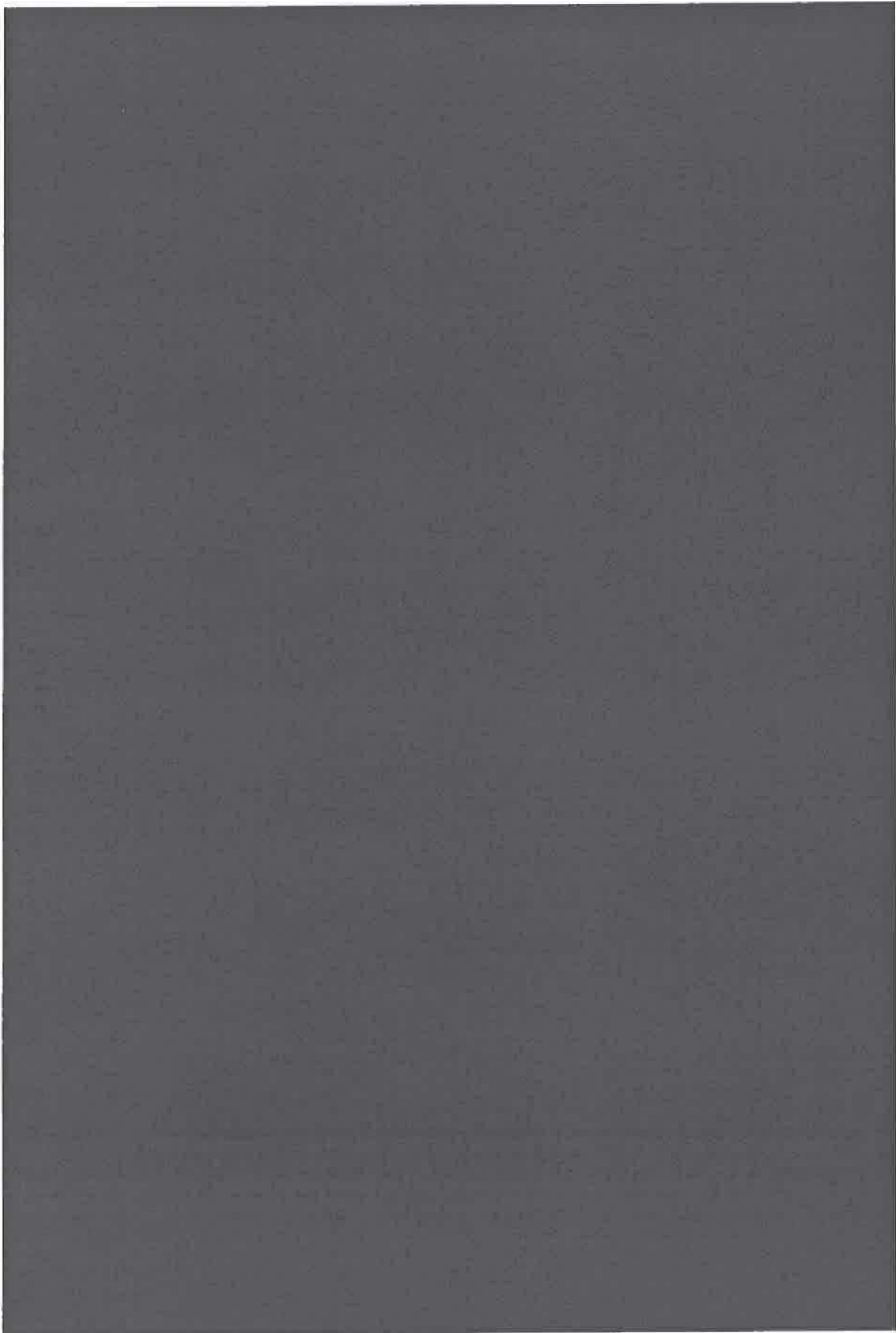


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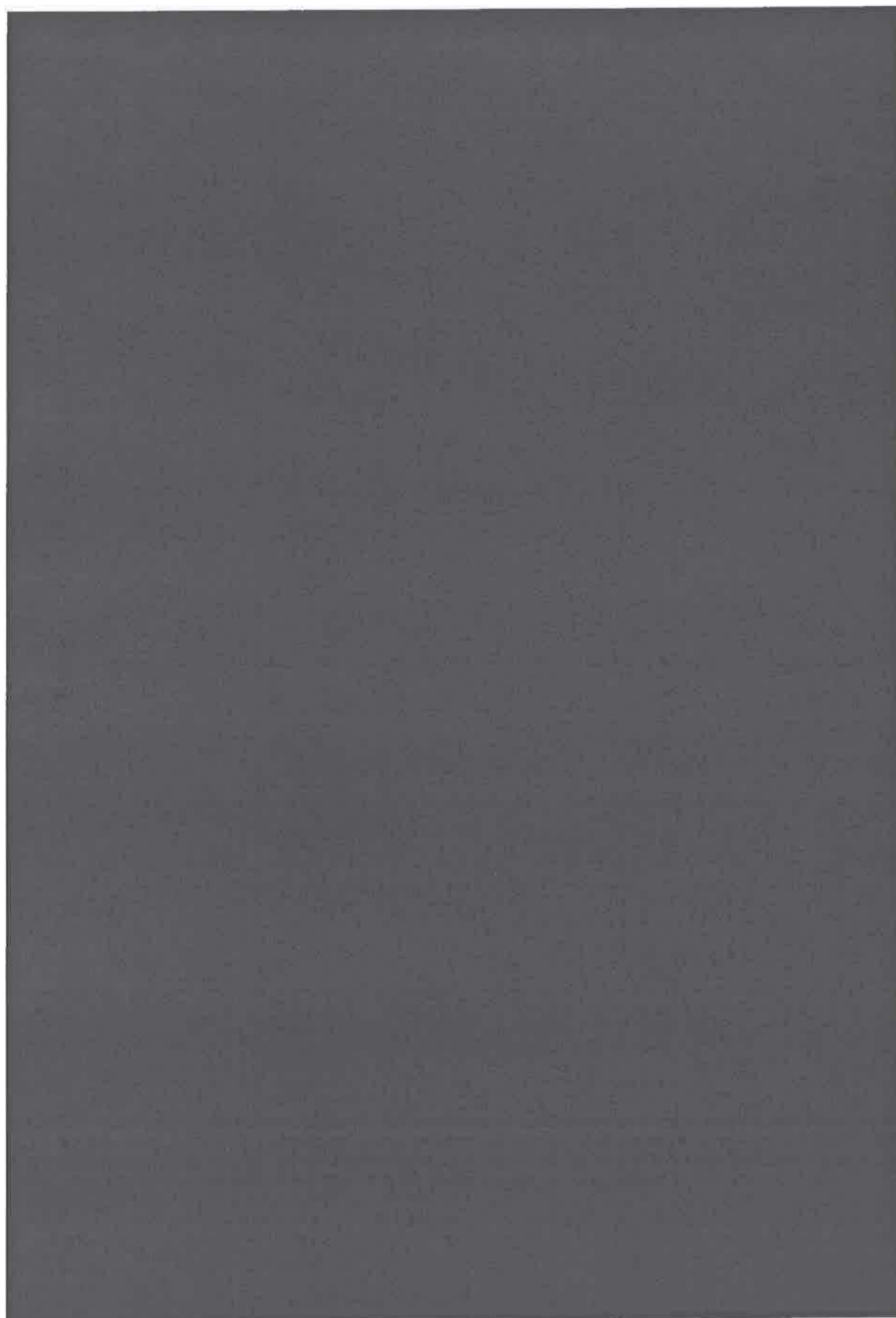


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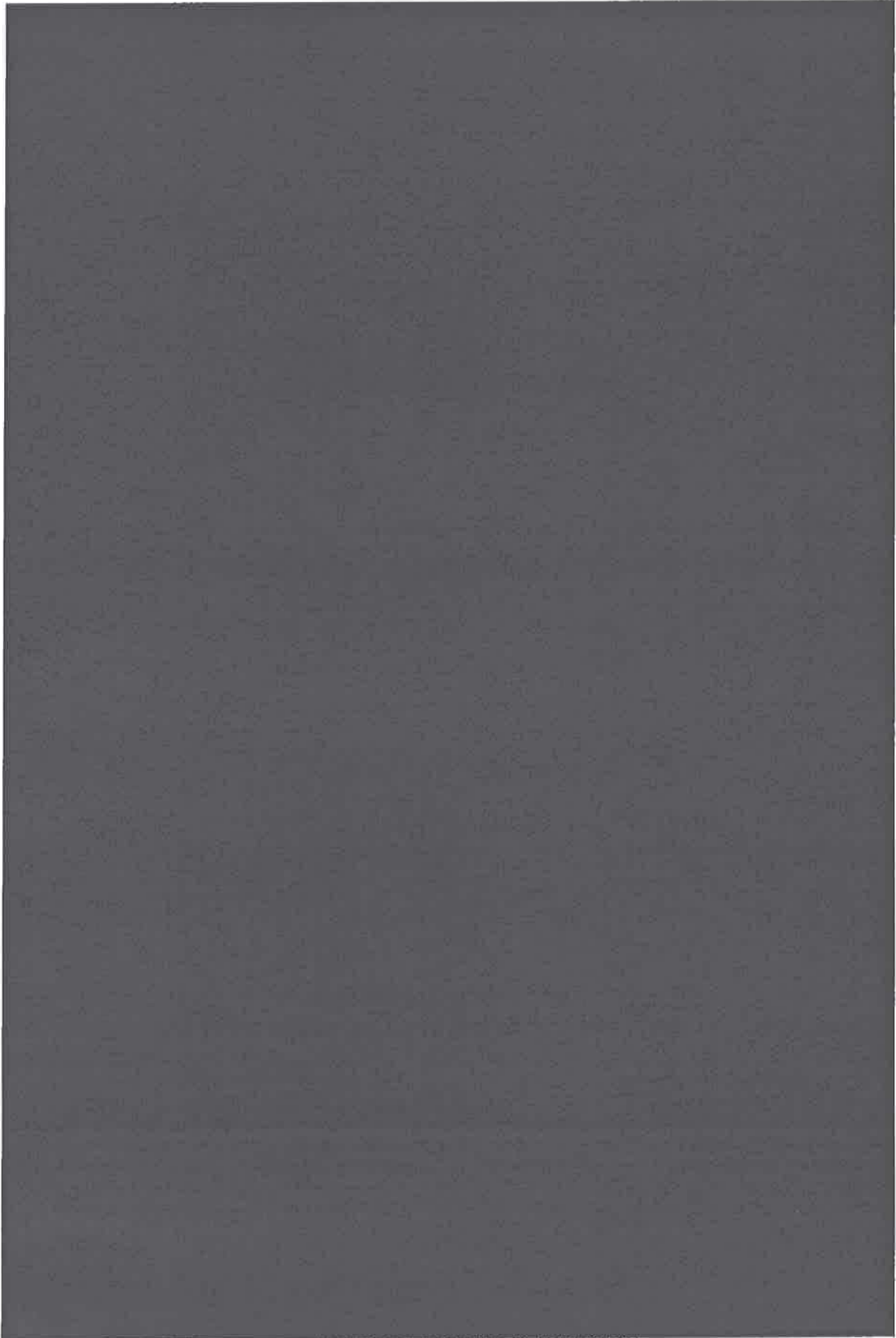




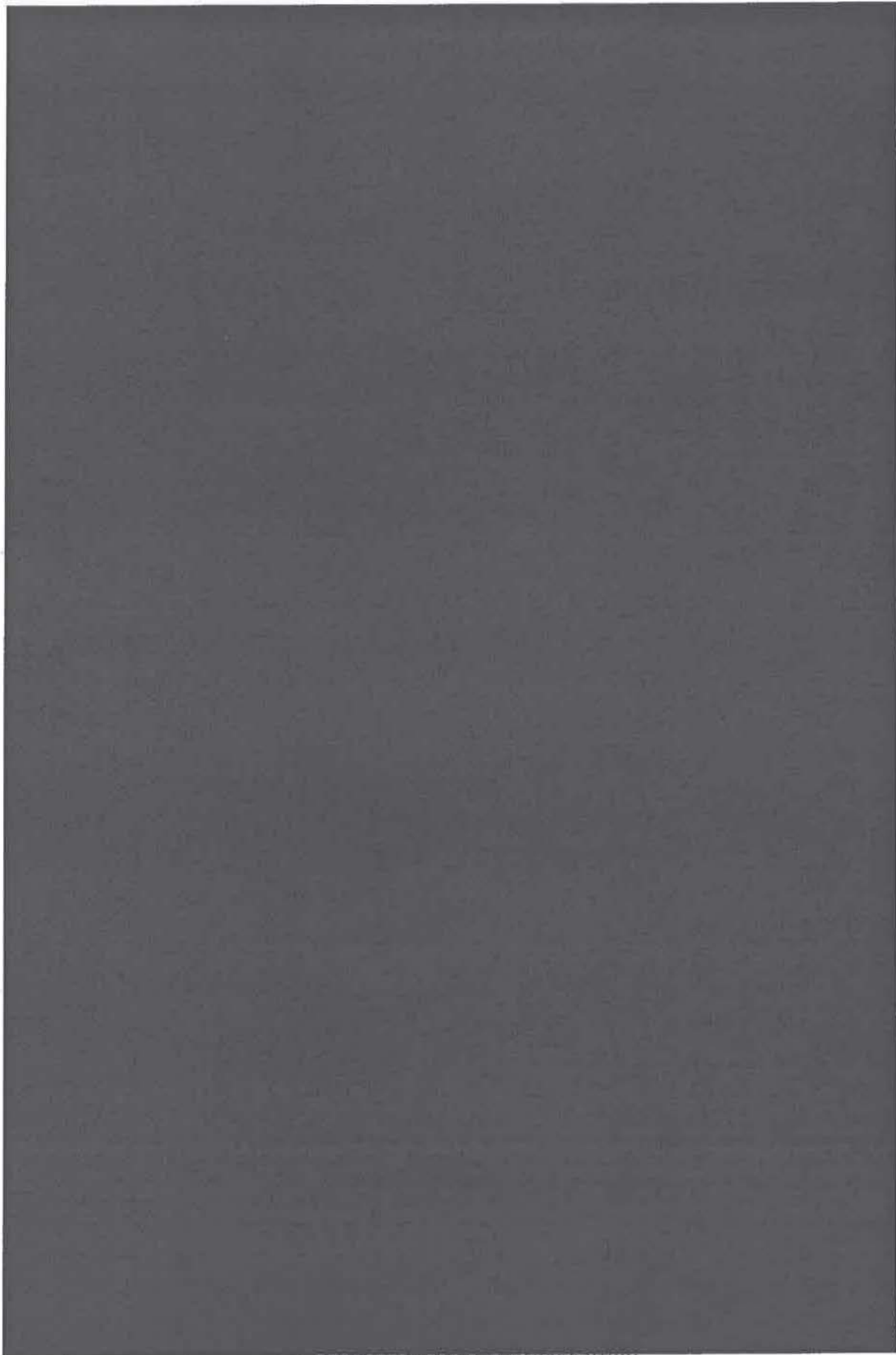
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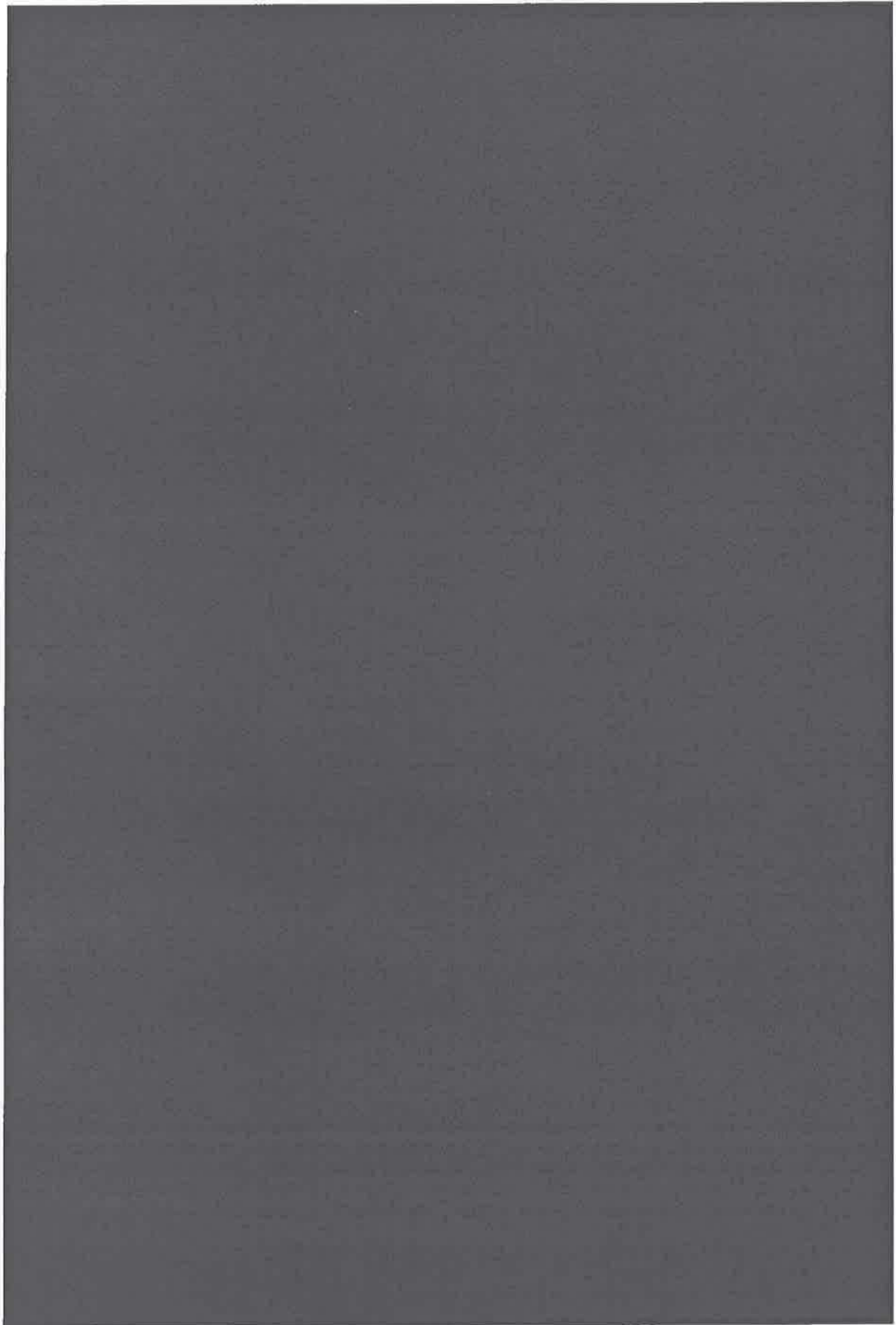
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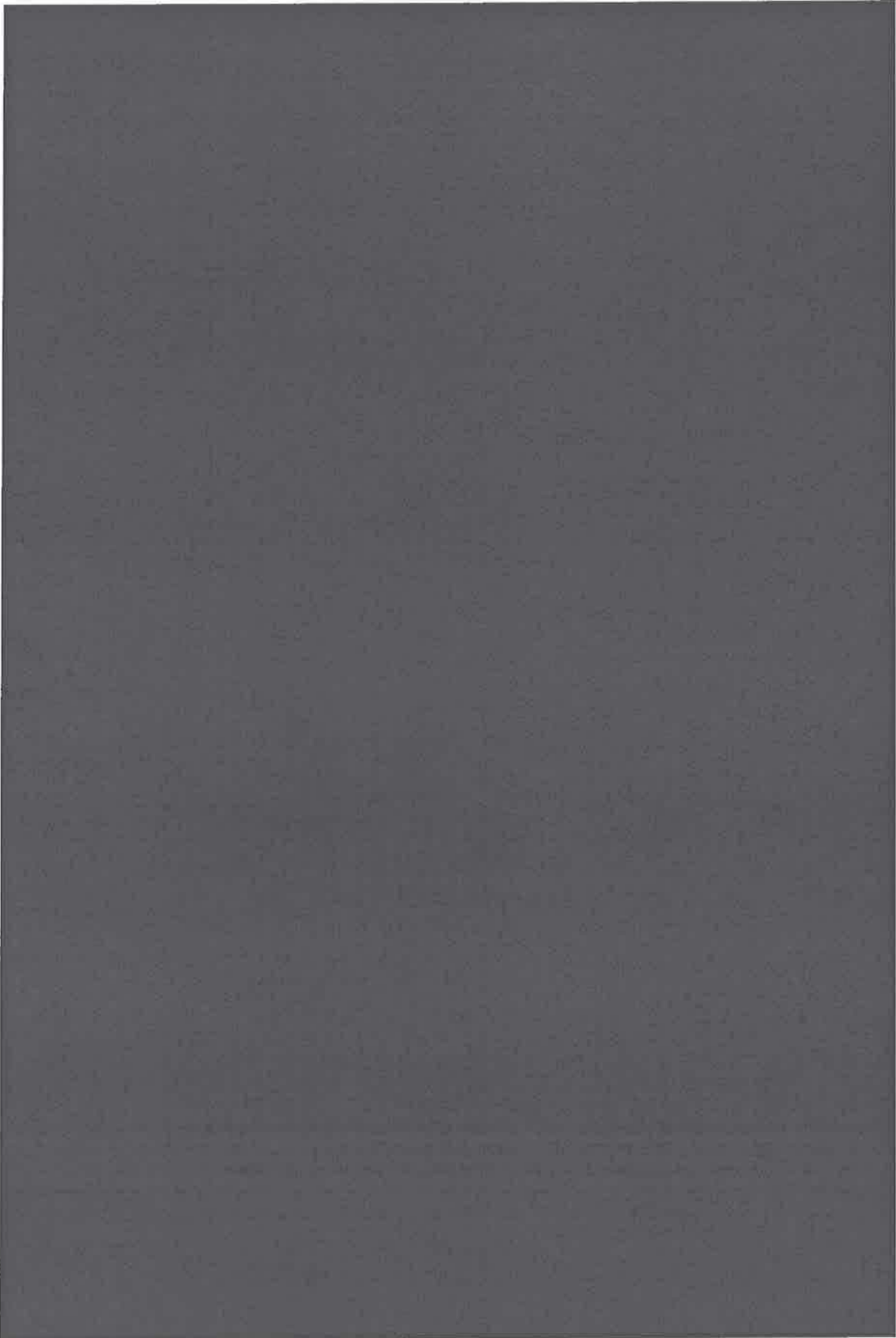
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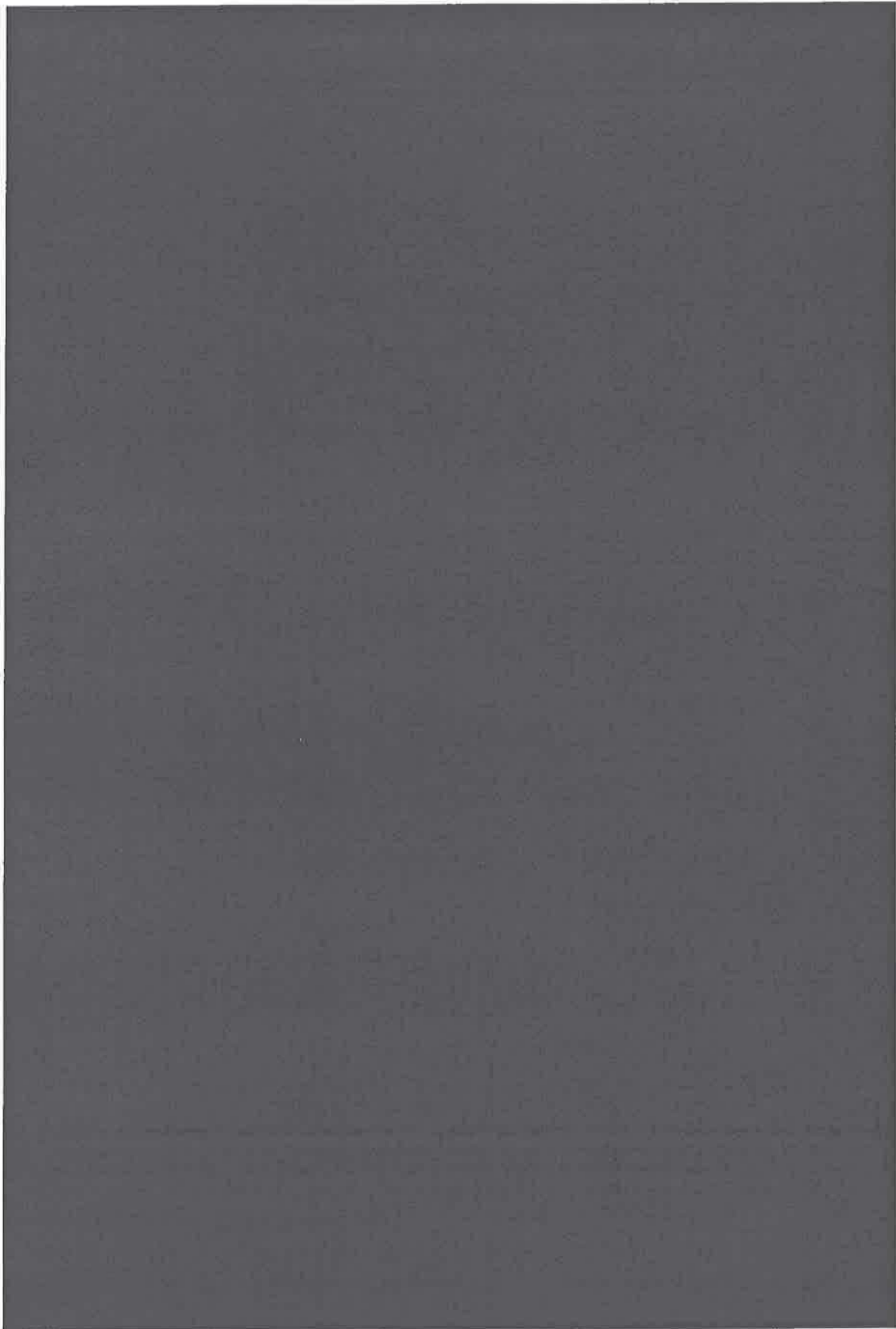
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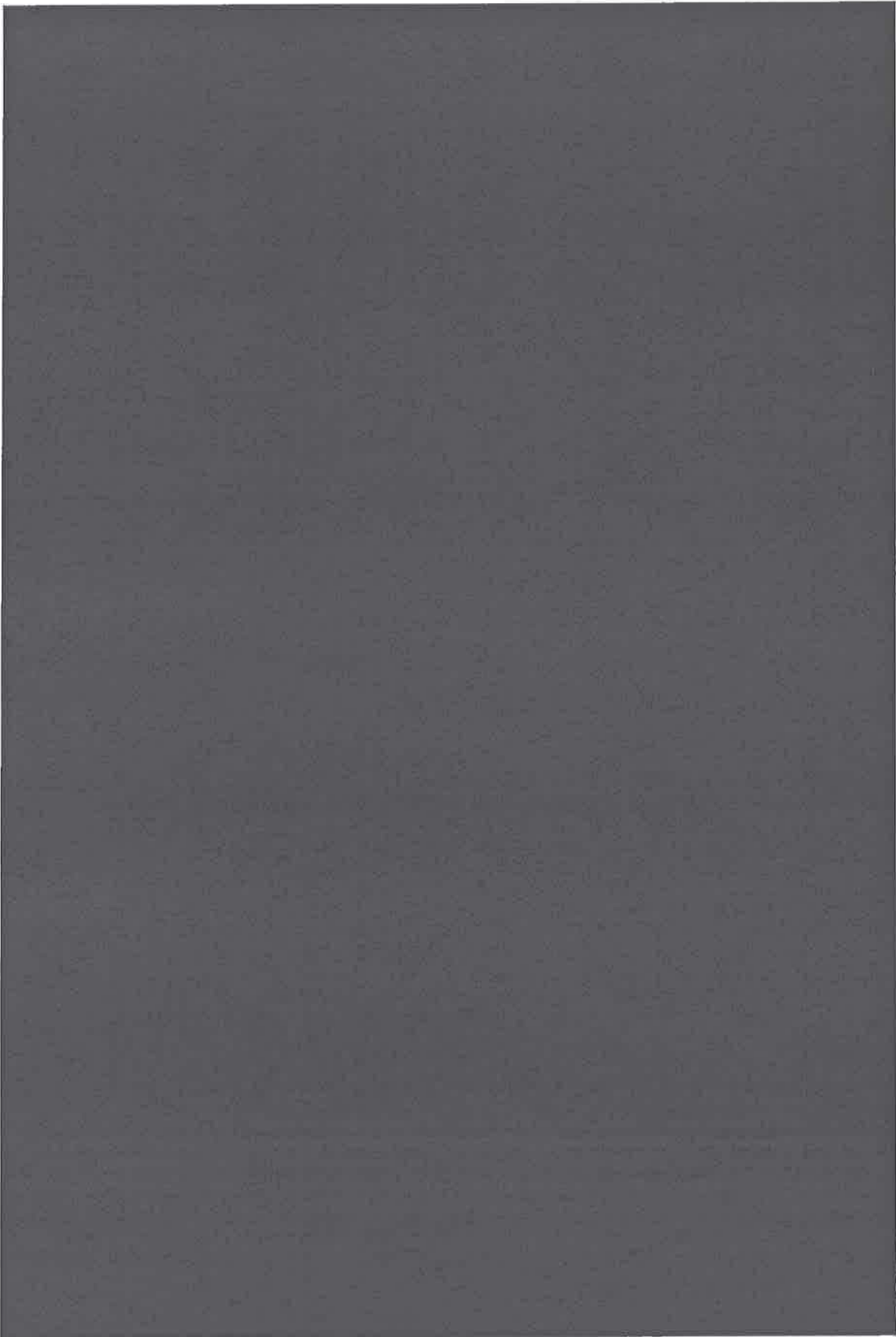


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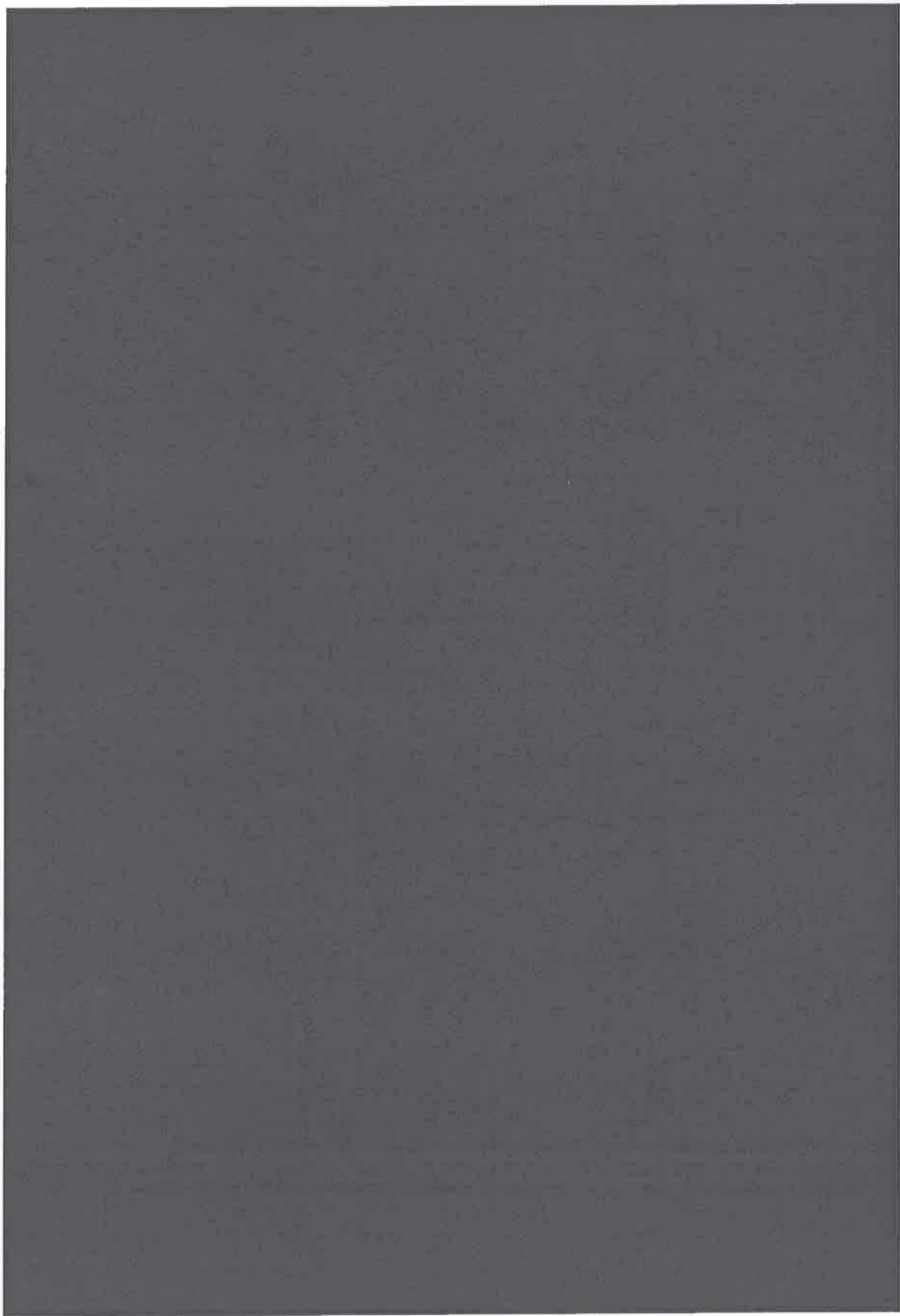


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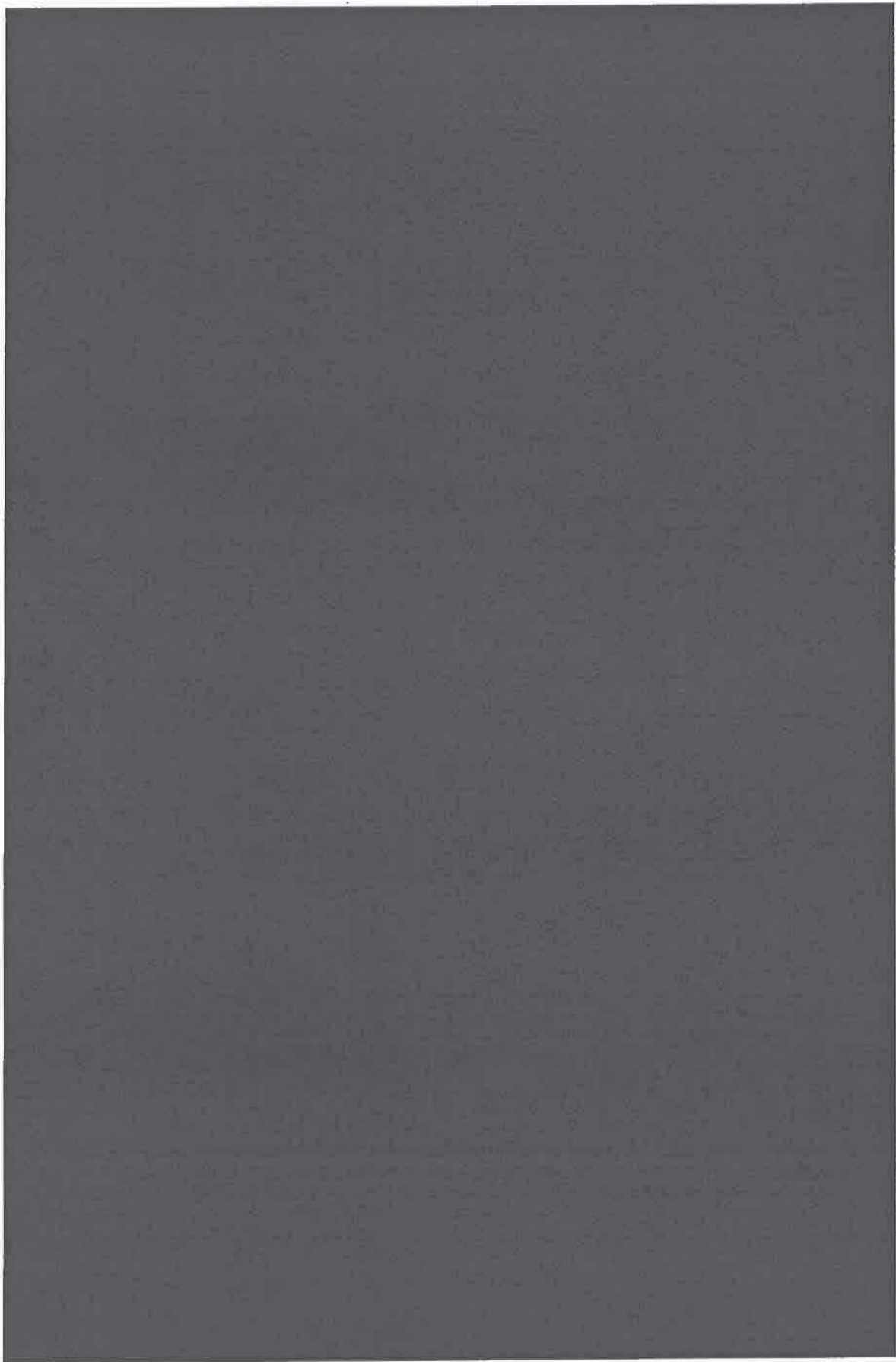




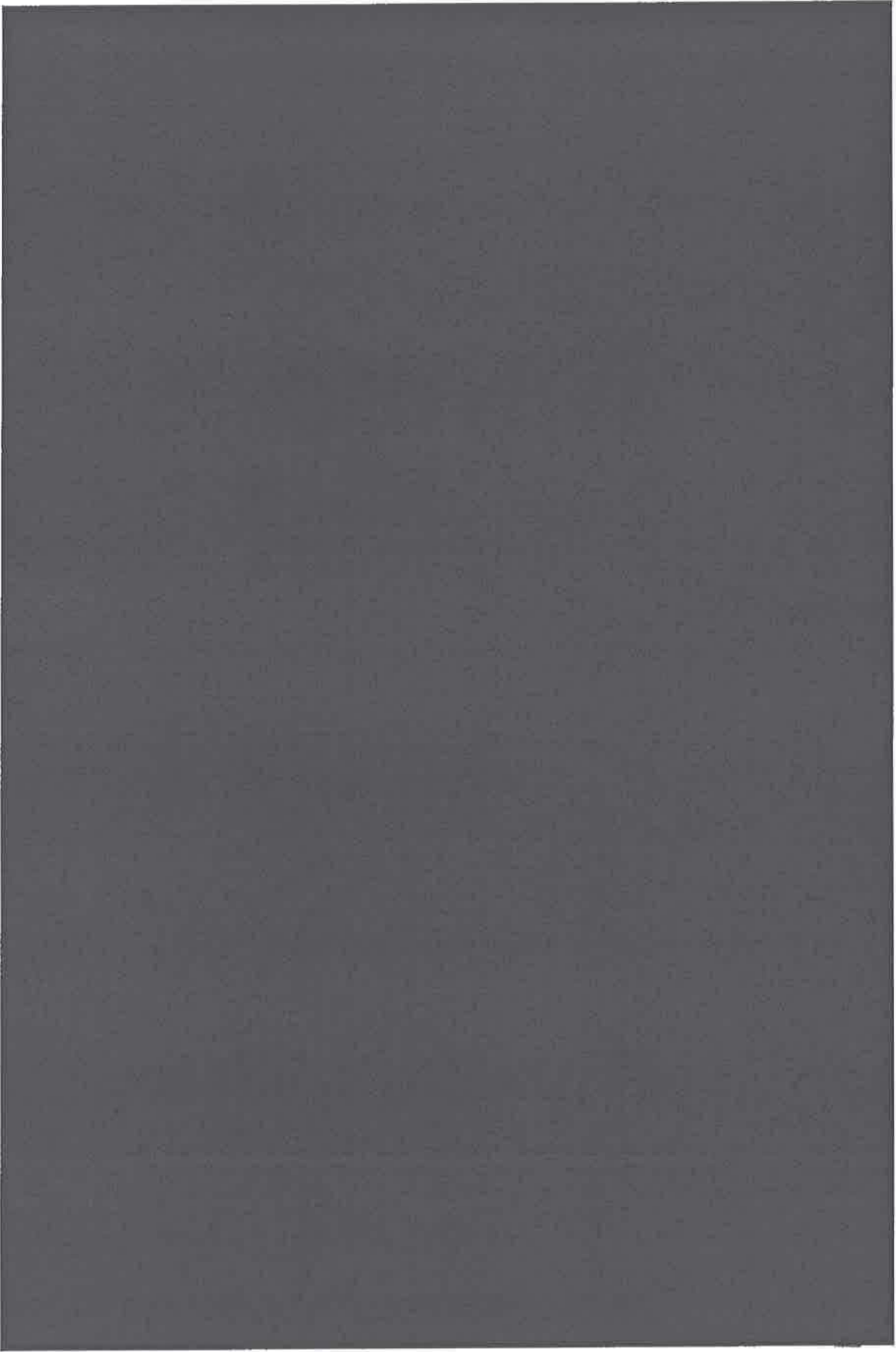
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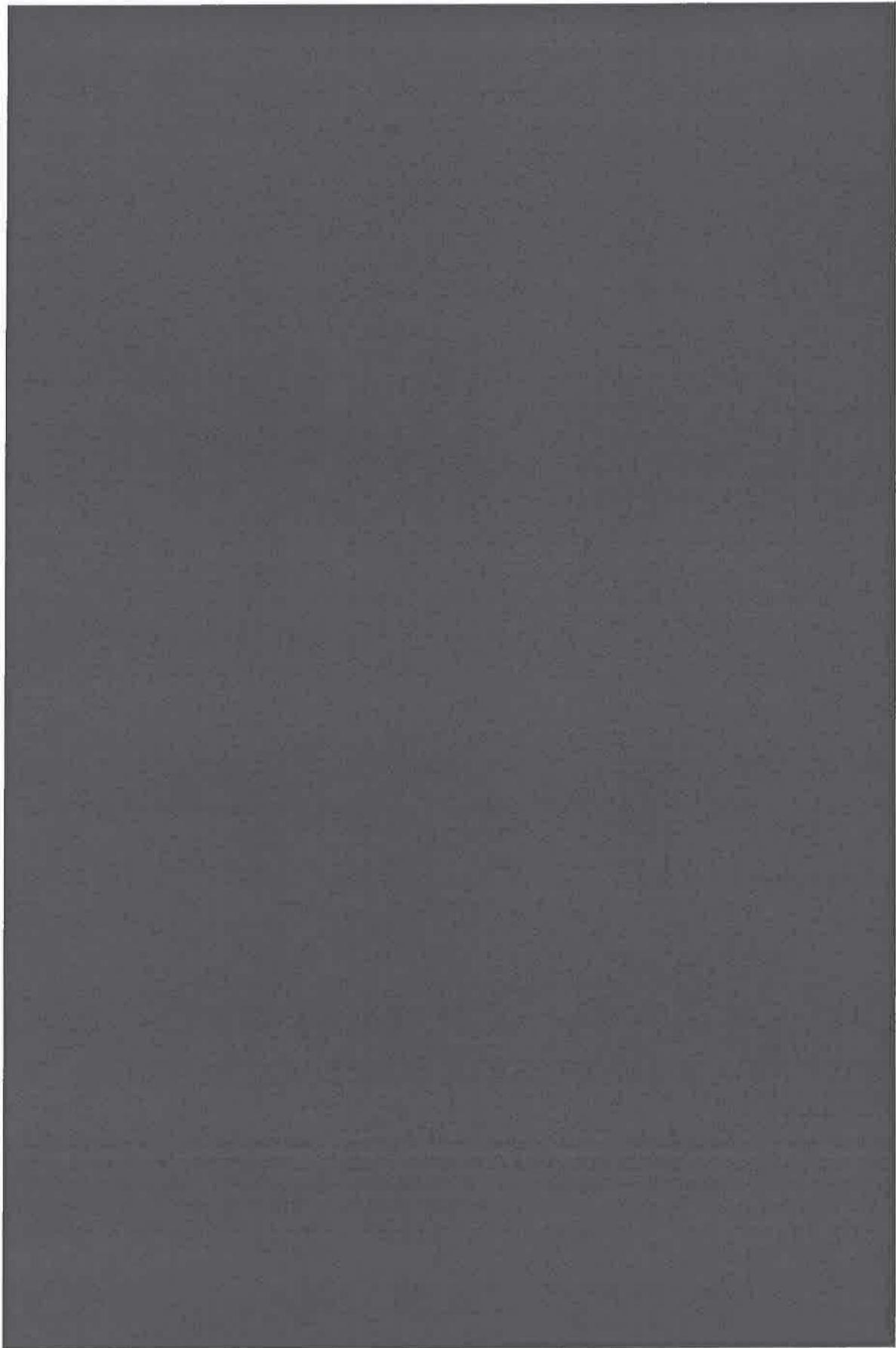


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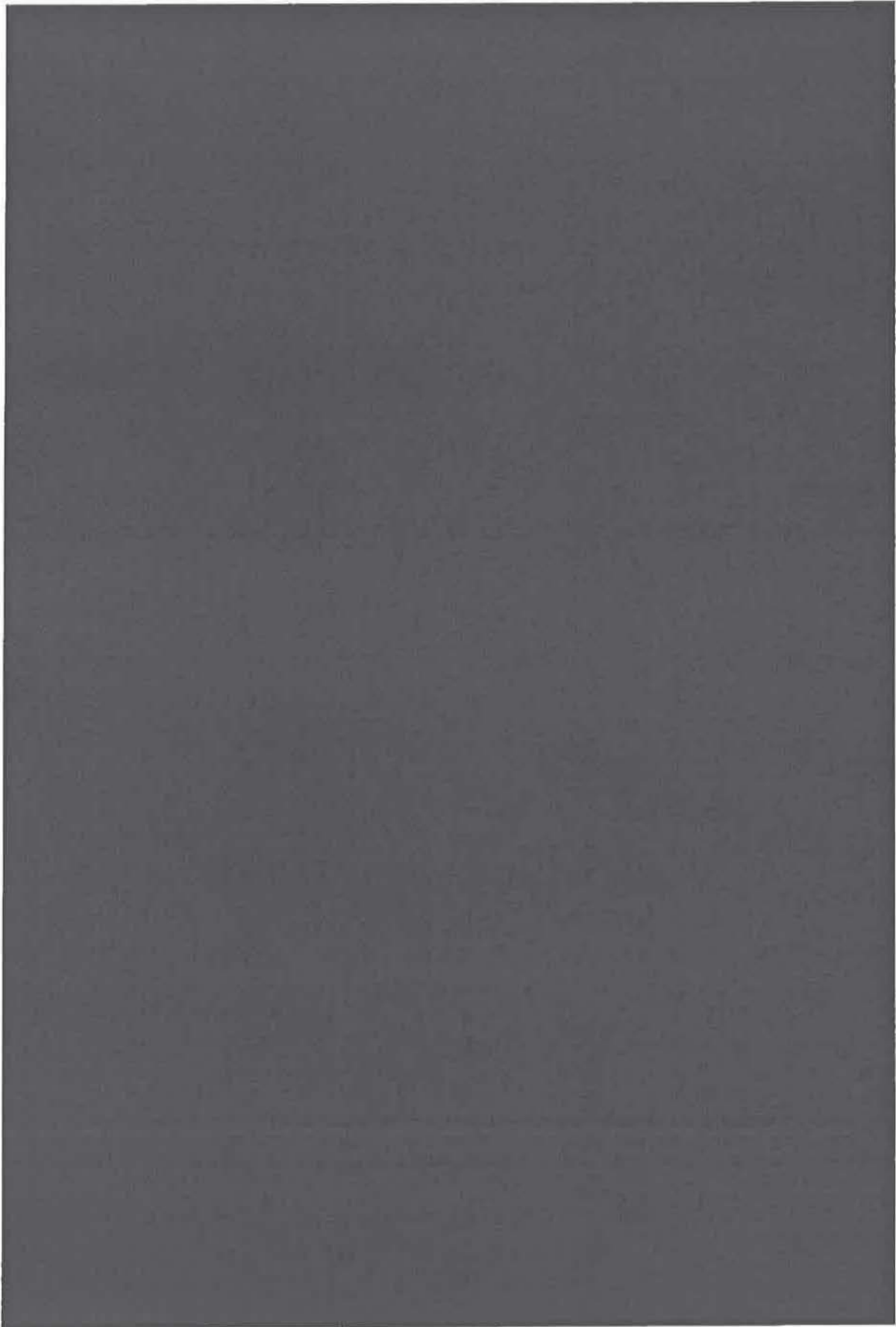


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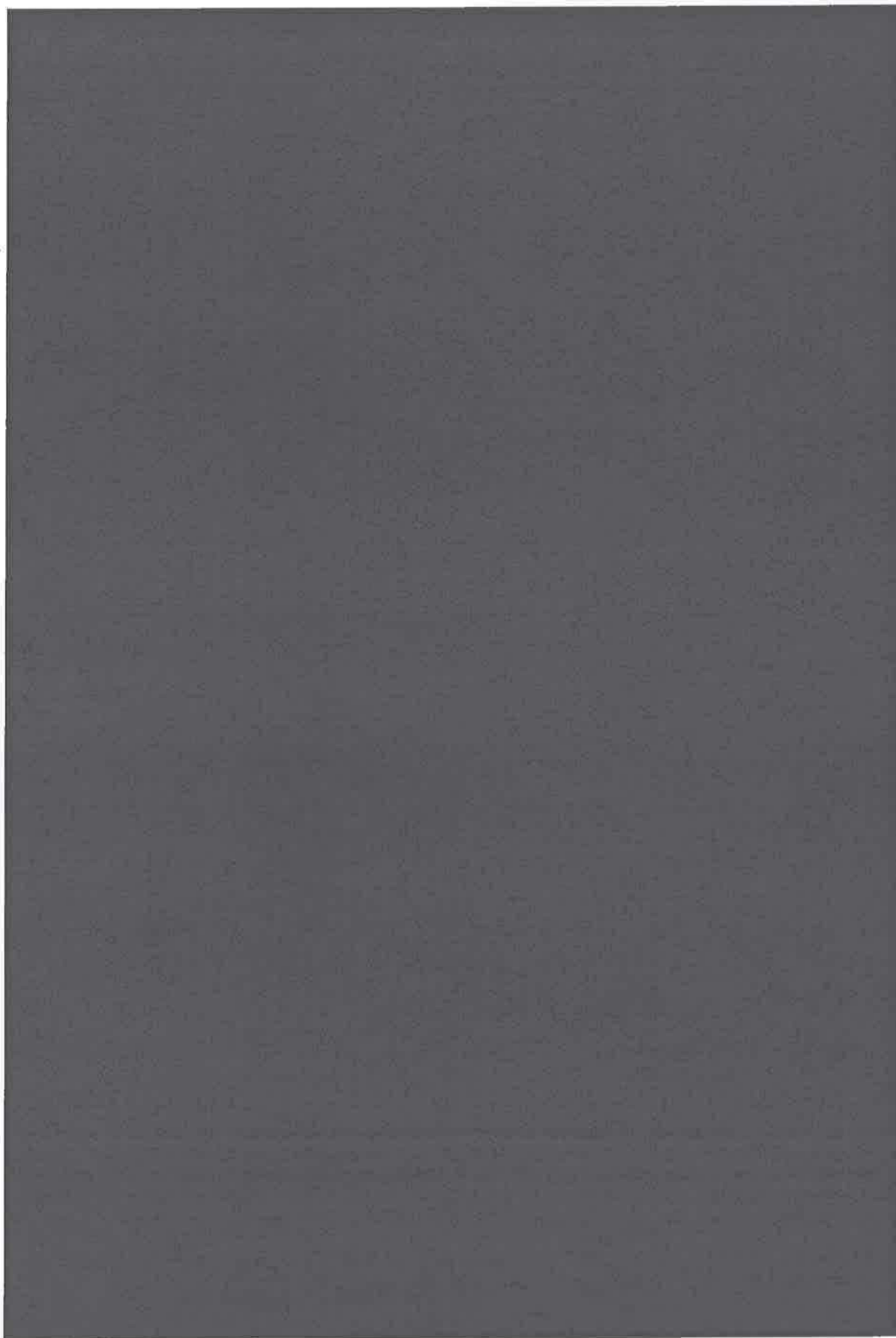




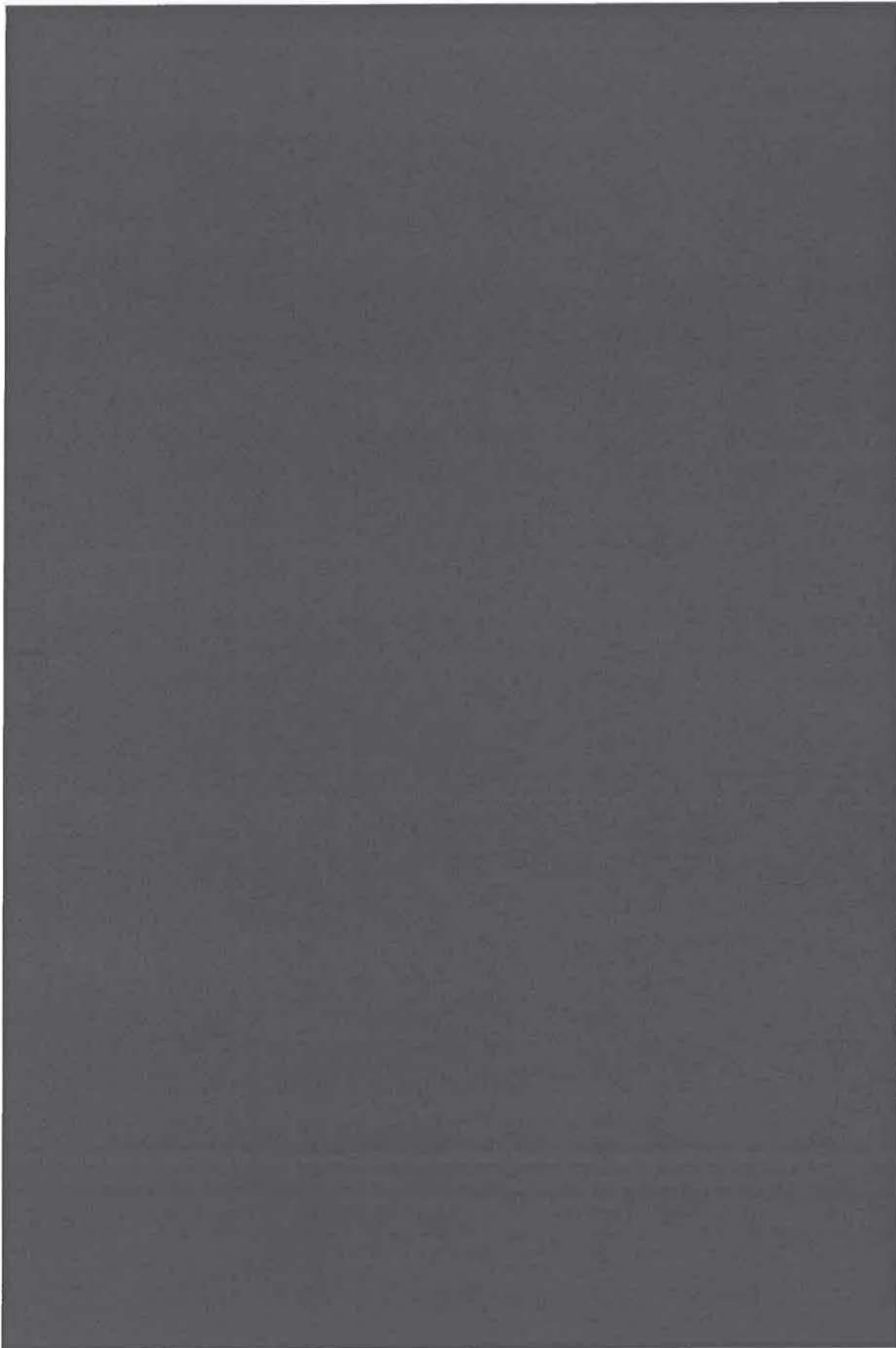
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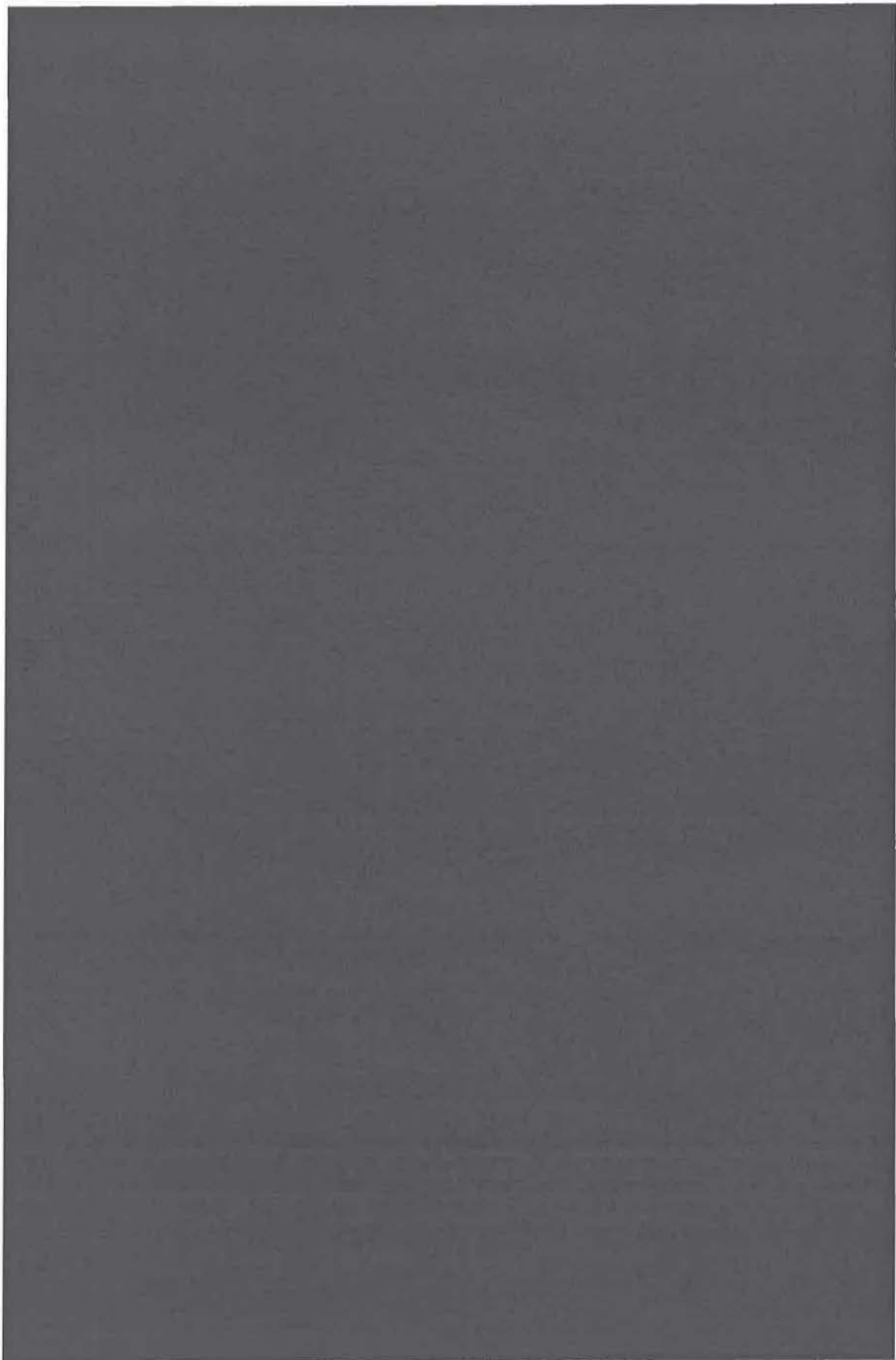
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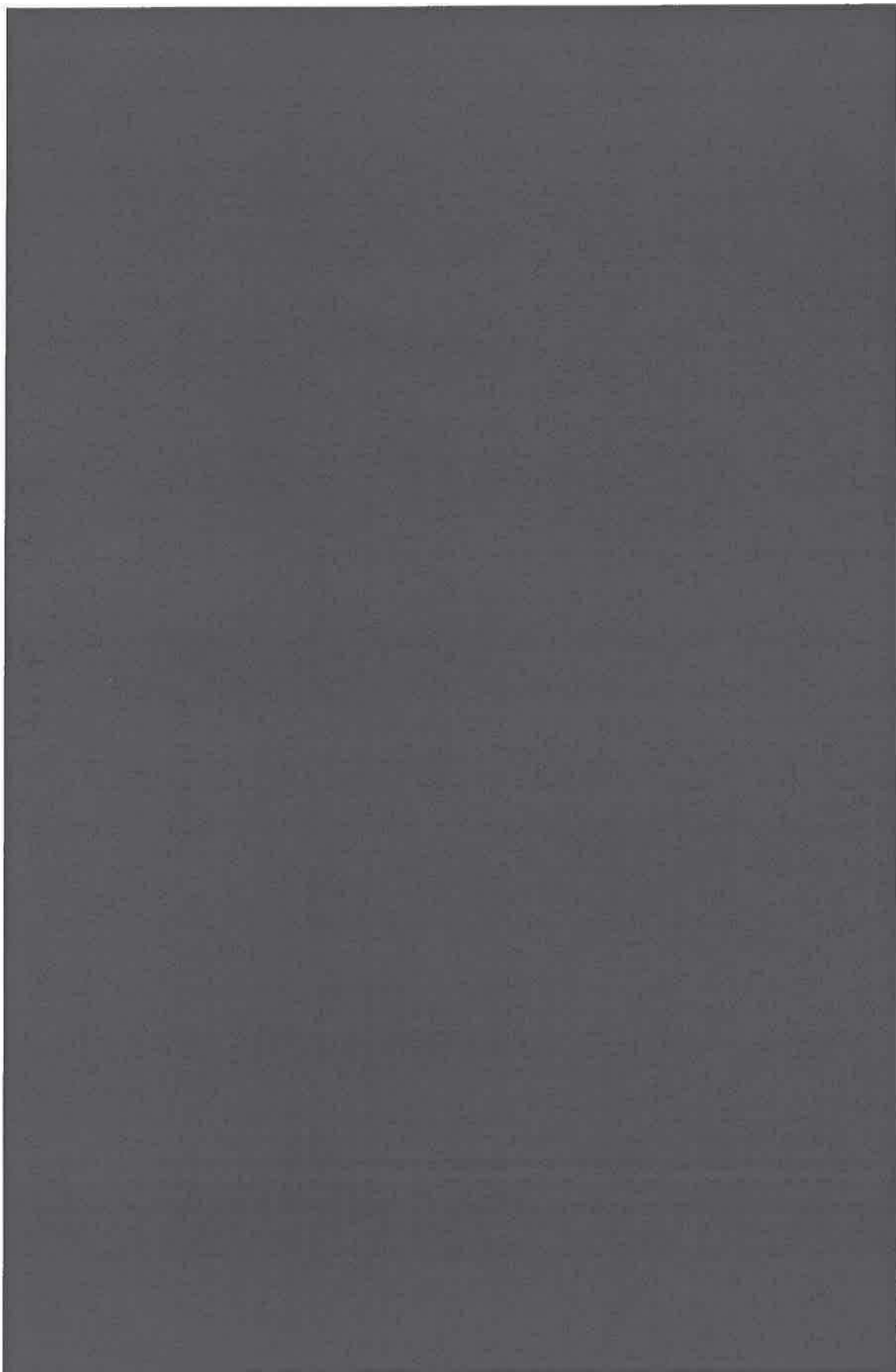


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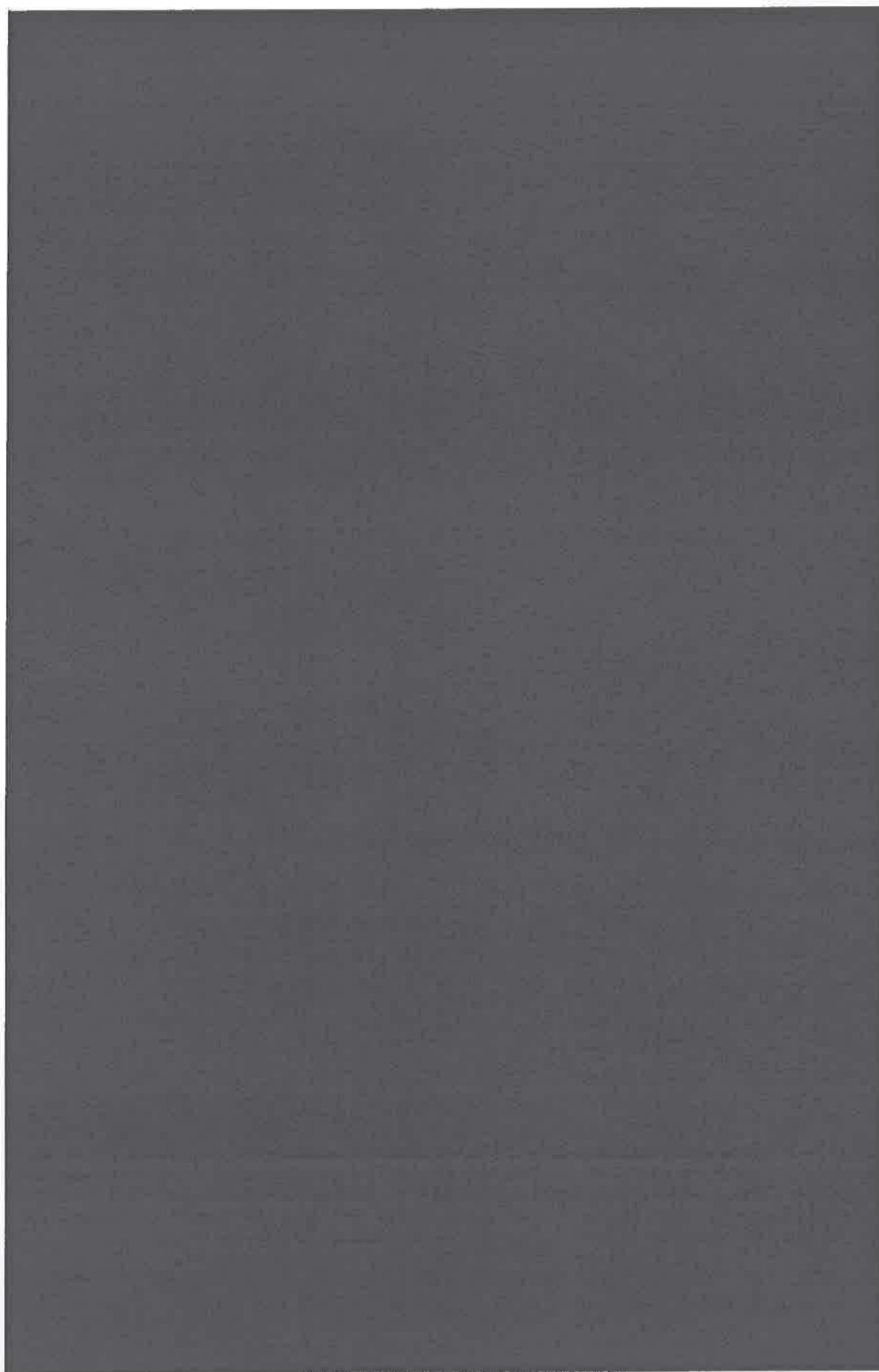


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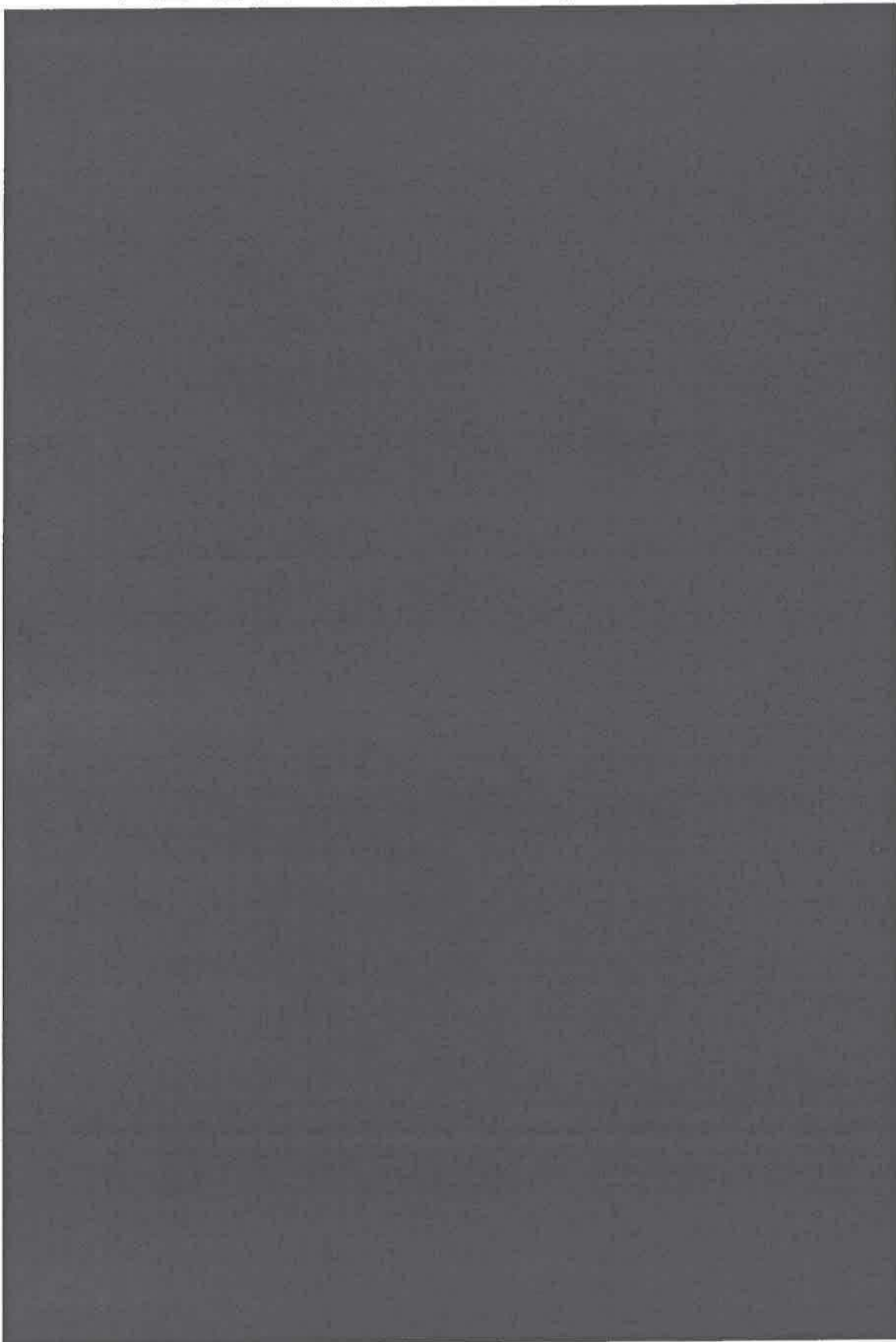




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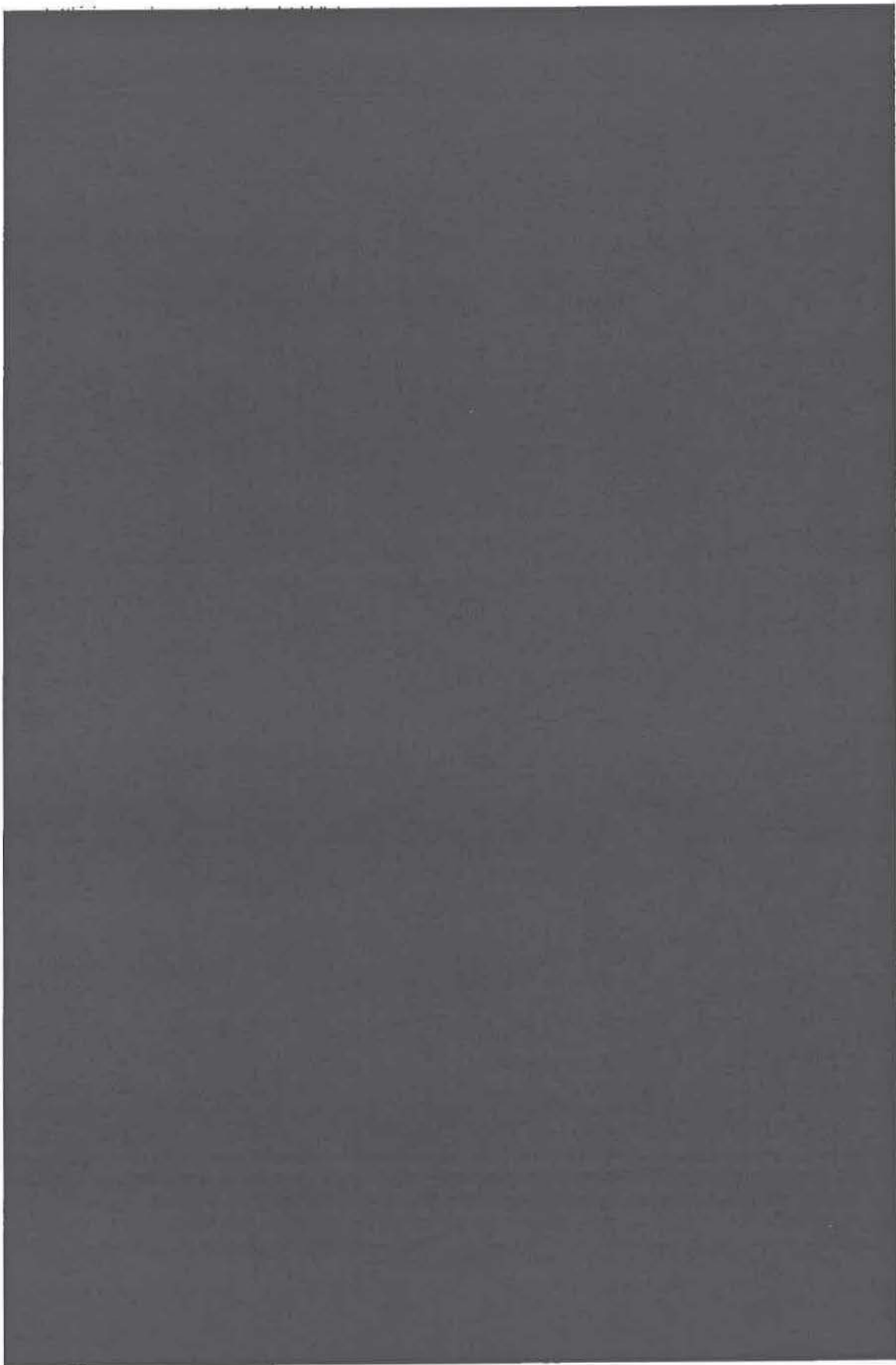


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(200) Service Outage Reporting (Voice) FCC Form 481  
Data Collection Form OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

613019

015	Study Area Name	OTZ TEL COOPERATIVE
-----	-----------------	---------------------

020	Program Year	2015
-----	--------------	------

030	Contact Name - Person USAC should contact regarding this data	Douglas A. Neal
-----	---	-----------------

<035> Contact Telephone Number - Number of person identified in data line <030> 9074421000 ext.

<039>	Contact Email Address - Email Address of person identified in data line <030>	dneal@otz.net
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◀220▶

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REDACTED - FOR PUBLIC INSPECTION



**OTZ TELEPHONE COOPERATIVE, INC.**

P.O. BOX 324  
KOTZEBUE, ALASKA 99752  
(907) 442-3114  
FAX (907) 442-2123  
1-800-478-3111

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20544

Re: WC Docket Nos. 10-90 and 11-42, Annual 47 C.F.R. § 54.313(a)(5) and § 54.422  
Certification via Form 481, Line No. 510

Dear Ms. Dortch:

Please accept this letter as certification that **OTZ Telephone Cooperative, Inc.** will make reasonable efforts to comply with applicable service quality standards as stated in Alaska Administrative Code 3 AAC 53.700 State Telecommunications Modernization Plan and consumer protection rules as defined in 47 C.F.R. Part 64 Subpart U, Customer Proprietary Network Information and the Federal Trade Commission Red Flag rules to prevent identity theft.

**OTZ Telephone Cooperative, Inc.** adheres to Consumer Protection by complying with the requirements of 47 CFR Part 64 Subpart U, Customer Proprietary Network Information and the Federal Trade Commission Red Flag rules to prevent identity theft. A manual for each of those programs is in place and is part of the employees' handbook. Employee training is conducted annually and new hires are instructed on the programs as required by their job functions.

**OTZ Telephone Cooperative, Inc.** also adheres to Service Quality Standards by complying with the service standards of the State of Alaska as promulgated in the Alaska Administrative Code 3 AAC 53.700 State Telecommunications Modernization Plan.

Sincerely,

Douglas A. Neal  
Chief Executive Officer



**OTZ TELEPHONE COOPERATIVE, INC.**

P.O. BOX 324  
KOTZEBUE, ALASKA 99752  
(907) 442-3114  
FAX (907) 442-2123  
1-800-470-3111

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20544

Re: WC Docket Nos. 10-90 and 11-42, Annual 47 C.F.R. § 54.313(a)(6) and § 54.422  
Certification via Form 481, Line No. 610

Dear Ms. Dortch:

Please accept this letter as certification that **OTZ Telephone Cooperative, Inc.** will make reasonable efforts to function in emergency situations as set forth in 47 C.F.R. §54.202(a)(2) and in Alaska Administrative Code 3 AAC 53.410(a)(12).

Back-up Power

**OTZ Telephone Cooperative, Inc.** has the following back-up power capabilities:

Switches -- stand alone and/or host

Ambler CO Switch	Back-up Honda Alpha DCX 3000 48 volt, 3,000 watt generator, and a 48 volt Marathon M12V90's battery plant with four (4) 90 amp hour batteries. Generator fuel storage tank is 3.5 gallons and provides emergency run time of ten (10) hours and additional battery reserve power of four (4) hours.
Buckland CO Switch	Back-up Honda EB 11,000 AC, 10,500 watt generator, and a 48 volt Fiamm FA2014, 600 amp hour battery plant. Generator fuel storage tank is 6.9 gallons and provides emergency run time of five (5) hours and additional battery reserve power of seventeen (17) hours.
Deering CO Switch	Back-up Honda EB 11,000 AC, 10,500 watt generator, and a 48 volt Deka Unigy II AVR 85-15, 630 amp hour battery plant. Generator fuel storage tank is 6.9 gallons and provides emergency run time of five (5) hours and additional battery reserve power of twenty-three (23) hours.

Kiana CO Switch	Back-up Honda EB 11,000 AC, 10,500 watt Generator, and a 48 volt Deka Unigy II AVR 85-15, 630 amp hour battery plant. Generator fuel storage tank is 6.9 gallons and provides emergency run time of five (5) hours and additional battery reserve power of twenty-three (23) hours.
Kivalina CO Switch	Back-up Honda EB 11,000 AC, 10,500 watt generator, and a 48 volt Deka Unigy II AVR 95-17, 760 amp hour battery plant. Generator fuel storage tank is 6.9 gallons and provides emergency run time of five (5) hours and additional battery reserve power of twenty-one (21) hours.
Kobuk CO Switch	Back-up Honda Alpha DCX 3000 48 volt, 3,000 watt generator, with a 48 volt Marathon M12V90's battery plant with eight (8) 90 amp hours batteries. Generator fuel storage tank is 3.5 gallons and provides emergency run time of ten (10) hour and additional battery reserve power of six (6) hours.
Kotzebue CO Switch	Back-up Honda Alpha DCX 3000 48 volt, 3,000 watt generator, and a 48 volt Deka Unigy II AVR 125-33, 2,000 amp hour battery plant. Generator fuel storage tank is 3.5 gallons and provides emergency run time of ten (10) hours and additional battery reserve power of twenty (20) hours.
Noatak CO Switch	Back-up Honda EB 11,000 AC, 10,500 watt generator, and a 48 volt Deka Unigy II AVR 95-17, 760 amp hour battery plant. Generator fuel storage tank is 6.9 gallons and provides emergency run time of five (5) hours and additional battery reserve power of twenty-three (23) hours.
Noorvik CO Switch	Back-up Honda GX 620 AC, 12,000 watt generator, and a 48 volt Deka Unigy II AVR 95-11, 475 amp hour battery plant. Generator fuel storage tank is 6.9 gallons and provides emergency run time of five (5) hours and additional battery reserve power of fifteen (15) hours.
Red Dog CO Switch	Back-up generator is supplied by Teck Cominco Alaska Incorporated. The battery plant is a 48 volt C&D TEL1-105F with 200 amp hour. The battery reserve power is ten (10) hours without the generator.
Selawik CO Switch	A 48 volt Deka Unigy II AVR 95-17, 760 amp hour battery plant provides twenty-seven (27) hours of reserve power.



Shungnak CO Switch      A 48 volt Deka Unigy II AVR 95-7, 285 amp hour battery plant provides eleven (11) hours of reserve power.

Remote Central Offices      None

Subscriber Carrier – Digital Loop Carrier Equipment

Kotzebue Exchange      Adtran Back-up Honda Alpha DCX 3000 48 volt, 3,000 watt generator, and a 48 volt Deka Unigy II AVR 125-33, 2,000 amp hour battery plant. Generator fuel storage tank is 3.5 gallons and provides 10 hours run-time. Note that run time will be continuous with Village Rep at site to keep the Generator refueled.

Ambler Exchange      Adtran Back-up Honda DCX 3000 48 volt, 3,000 watt generator, and a 48 volt Marathon M12V90, 180 amp hour battery plant. With the amperage load at this site, there is 8 hours battery run-time. Generator fuel storage tank is 3.5 gallons and provides 10 hours run time. Note that run time will be continuous with Village Rep at site to keep the Generator refueled.

Kobuk Exchange      Adtran Back-up Honda DCX 3000 48 volt, 3,000 watt generator, and a 48 volt Marathon M12V90, 180 amp hour battery plant. With the amperage load at this site there is 8 hours battery run-time. Generator fuel storage tank is 3.5 gallons and provides 10 hours run time. Note that run time will be continuous with Village Rep at site to keep the Generator refueled.

Network Interface Devices (NIDs)

**OTZ Telephone Cooperative, Inc.** has 2,363 customers with metallic (copper) connections to the Central Offices and their NIDs are powered from the Central Offices.

Ability to reroute traffic around damaged facilities:

**OTZ Telephone Cooperative, Inc.** has stand alone locations connected by satellite. All exchanges except one provide equal access with AT&T and GCI for interconnection to the Public Switched Telephone Network.

Capability to manage traffic spikes resulting from emergency situations

Ambler Exchange      **OTZ Telephone Cooperative, Inc.** has 87 customers, switching capacity of 160 simultaneous calls, and transport capacity for 24 simultaneous



calls. **OTZ Telephone Cooperative, Inc.** takes no responsibility for the capabilities of interconnected networks to manage traffic spikes resulting from emergency situations, but will continue its best efforts for its networks during such events.

- Buckland Exchange** **OTZ Telephone Cooperative, Inc.** has 117 customers, switching capacity of 192 simultaneous calls, and transport capacity for 288 simultaneous calls. **OTZ Telephone Cooperative, Inc.** takes no responsibility for the capabilities of interconnected networks to manage traffic spikes resulting from emergency situations, but will continue its best efforts for its networks during such events.
- Deering Exchange** **OTZ Telephone Cooperative, Inc.** has 74 customers, switching capacity of 128 simultaneous calls, and transport capacity for 192 simultaneous calls. **OTZ Telephone Cooperative, Inc.** takes no responsibility for the capabilities of interconnected networks to manage traffic spikes resulting from emergency situations, but will continue its best efforts for its networks during such events.
- Kiana Exchange** **OTZ Telephone Cooperative, Inc.** has 116 customers, switching capacity of 224 simultaneous calls, and transport capacity for 336 simultaneous calls. **OTZ Telephone Cooperative, Inc.** takes no responsibility for the capabilities of interconnected networks to manage traffic spikes resulting from emergency situations, but will continue its best efforts for its networks during such events.
- Kivalina Exchange** **OTZ Telephone Cooperative, Inc.** has 95 customers, switching capacity of 224 simultaneous calls, and transport capacity for 336 simultaneous calls. **OTZ Telephone Cooperative, Inc.** takes no responsibility for the capabilities of interconnected networks to manage traffic spikes resulting from emergency situations, but will continue its best efforts for its networks during such events.
- Kobuk Exchange** **OTZ Telephone Cooperative, Inc.** has 60 customers, switching capacity of 96 simultaneous calls, and transport capacity for 24 simultaneous calls. **OTZ Telephone Cooperative, Inc.** takes no responsibility for the capabilities of interconnected networks to manage traffic spikes resulting from emergency situations, but will continue its best efforts for its networks during such events.
- Kotzebue Exchange** **OTZ Telephone Cooperative, Inc.** has 1,293 customers, switching capacity of 4,128 simultaneous calls, and transport capacity for 2,400 simultaneous calls. **OTZ Telephone Cooperative, Inc.** takes no responsibility for the capabilities of interconnected networks to manage traffic spikes resulting from emergency situations, but will continue its best efforts for its networks during such events.

Noatak Exchange     **OTZ Telephone Cooperative, Inc.** has 135 customers, switching capacity of 224 simultaneous calls, and transport capacity for 336 simultaneous calls. **OTZ Telephone Cooperative, Inc.** takes no responsibility for the capabilities of interconnected networks to manage traffic spikes resulting from emergency situations, but will continue its best efforts for its networks during such events.

Noorvik Exchange     **OTZ Telephone Cooperative, Inc.** has 129 customers, switching capacity of 256 simultaneous calls, and transport capacity for 384 simultaneous calls. **OTZ Telephone Cooperative, Inc.** takes no responsibility for the capabilities of interconnected networks to manage traffic spikes resulting from emergency situations, but will continue its best efforts for its networks during such events.

Red Dog Exchange     **OTZ Telephone Cooperative, Inc.** has 9 customers, switching capacity of 64 simultaneous calls, and transport capacity for 1056 simultaneous calls. **OTZ Telephone Cooperative, Inc.** takes no responsibility for the capabilities of interconnected networks to manage traffic spikes resulting from emergency situations, but will continue its best efforts for its networks during such events.

Selawik Exchange     **OTZ Telephone Cooperative, Inc.** has 181 customers, switching capacity of 416 simultaneous calls, and transport capacity for 624 simultaneous calls. **OTZ Telephone Cooperative, Inc.** takes no responsibility for the capabilities of interconnected networks to manage traffic spikes resulting from emergency situations, but will continue its best efforts for its networks during such events.

Shungnak Exchange     **OTZ Telephone Cooperative, Inc.** has 76 customers, switching capacity of 112 simultaneous calls, and transport capacity for 24 simultaneous calls. **OTZ Telephone Cooperative, Inc.** takes no responsibility for the capabilities of interconnected networks to manage traffic spikes resulting from emergency situations, but will continue its best efforts for its networks during such events.

Sincerely,



Douglas A. Neal  
Chief Executive Officer

<701>	Residential Local Service Charge Effective Date	1/1/2014
<702>	Single State-wide Residential Local Service Charge	

703

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710 Broadband Price Offerings  
Data Collection Form - 6/1/04

FCC Form 481  
OMB Control No. 3066-0986/OMB Control No. 3060-0813  
July 2013

<010>	Study Area Code	613019
<015>	Study Area Name	OTZ TEL COOPERATIVE
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Douglas A. Neal
<035>	Contact Telephone Number - Number of person identified in data line <030>	9074421000 ext.
<035>	Contact Email Address - Email Address of person identified in data line <030>	dneal@otz.net

711

[illegible]





**OTZ TELEPHONE COOPERATIVE, INC.**

P.O. BOX 324  
KOTZEBUE, ALASKA 99752  
(907) 442-3114  
FAX (907) 442-2123  
1-800-470-3111

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20544

Re: WC Docket No. 10-90, Annual 47 C.F.R. § 54.313(a)(9) Certification via Form 481, Line No. 920

Dear Ms. Dortch:

Please accept this letter as certification demonstrating that **OTZ Telephone Cooperative, Inc.** has coordinated with Tribal government as set forth in 47 C.F.R. §54.313(a)(9).

In 2013, **OTZ Telephone Cooperative, Inc.** contacted all of the tribal administrators in our service area in order to comply with the Universal Service Transformation Order. **OTZ Telephone Cooperative, Inc.** contacted the following organizations:

- Native Village of Ambler
- Buckland IRA Council
- Deering IRA Council
- Kiana Traditional Council
- Kivalina IRA Council
- Kobuk Traditional Council
- Kotzebue IRA Council
- Noatak IRA Council
- Noorvik IA Council
- Native Village of Selawik
- Shungnak IRA Council

Each tribal administrator was informed of **OTZ Telephone Cooperative Inc.'s** responsibility to work with all tribal offices regarding a variety of topics. Specifically, **OTZ Telephone Cooperative Inc.'s** discussions included (i) A needs assessment and deployment planning with a focus on Tribal community anchor institutions; (ii) Feasibility and sustainability planning; (iii) Marketing services in a culturally sensitive manner; (iv) Rights of way processes, land use permitting, facilities siting, environmental and cultural preservation review processes; and (v) Compliance with Tribal business and licensing requirements.

Sincerely,

Douglas A. Neal  
Chief Executive Officer





**OTZ TELEPHONE COOPERATIVE, INC.**

P.O. BOX 324  
KOTZEBUE, ALASKA 99752  
(907) 442-3114  
FAX (907) 442-2123  
1-800-478-3111

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20544

Re: WC Docket Nos. 10-90 and 11-42, Annual 47 C.F.R. § 54.422(a)(2) Certification via Form 481, Line No. 1210

Dear Ms. Dortch:

Please accept this letter as certification that **OTZ Telephone Cooperative, Inc.** offers Lifeline services as set forth in 47 C.F.R. §54.422(a)(2). The following information describes the terms and conditions of all voice telephony service plans offered to Lifeline subscribers.

For its Wireline Lifeline service, **OTZ Telephone Cooperative, Inc.** charges subscribers \$0.00 per month. This amount includes all federally mandated charges and access fees. Subscribers receive unlimited local minutes per month. In order to add long distance service, a deposit of \$90.00 is required.

To qualify, a subscriber must fill out an application and certify that they meet the federal guidelines; copy of the application/certification is included on the following pages.

Sincerely,

Douglas A. Neal  
Chief Executive Officer



OTZ & OTZT  
P.O. Box 324  
Kotzebue, AK 99762  
Ph: 907 442 3114  
Fx: 907 442 2123  
Toll Free: 800 478 3111  
www.otz.net



#### CERTIFICATION FOR LIFELINE SERVICE

PROGRAM RULES: Lifeline is a federal benefit and willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program. OTZ & OTZT are required by the Federal Communications Commission, or FCC, to verify your eligibility to participate in the Lifeline program.

Under penalty of perjury you must certify, acknowledge, and agree that the following statements in red are true to the best of your knowledge. Indicate your acknowledgement of each statement with a checkmark.

Only one Lifeline discount is allowed per household, consisting of either telephone or cell service. A household is not permitted to receive Lifeline benefits from multiple providers. Violation of the one-per-household requirement constitutes a violation of FCC rules and will result in your de-enrollment from the program, and potentially, criminal prosecution. A household is any individual or group of individuals who live together at the same address and share income and expenses.

- ☐ I CERTIFY MY HOUSEHOLD WILL RECEIVE ONLY ONE LIFELINE SERVICE AND, TO THE BEST OF MY KNOWLEDGE, MY HOUSEHOLD IS NOT ALREADY RECEIVING LIFELINE SERVICE.

#### APPLICANT INFORMATION

Last Name	First Name	Middle	Billing Phone Number
Street Address (not a P.O. Box)			
City		State	Zip Code
The address listed above is		<input type="checkbox"/> Permanent OR <input type="checkbox"/> Temporary	
Social Security Number (last 4 digits)		Date of Birth (mm/dd/yyyy)	

#### BILLING ADDRESS

Street Address	City	State	Zip Code
----------------	------	-------	----------

#### ELIGIBILITY REQUIREMENTS

You will be required to demonstrate eligibility based on (1) Participation in one of the assistance programs listed below; OR (2) Household Income at or below 135% of Federal Poverty guidelines for your household size.

- ☐ I CERTIFY UNDER PENALTY OF PERJURY THAT I OR A MEMBER OF MY HOUSEHOLD MEETS THE INCOME-BASED OR PROGRAM BASED ELIGIBILITY CRITERIA FOR RECEIVING THE LIFELINE DISCOUNT.

Indicate by checkmark the program for which you are providing a document demonstrating your current program:

##### Alaska State Assistance Programs

- ☐ Adult Public Assistance Program
- ☐ Child Care Assistance Program (PASS I, II, & III)
- ☐ Woman, Infants and Children's Program (WIC)
- ☐ Alaska Heating Assistance
- ☐ Pioneer Home Payment Assistance
- ☐ Denali Kid Care
- ☐ Senior Care
- ☐ Alaska State Housing Corporation Programs  
(Public Housing, Interest Rate Reduction for Low  
Income Borrowers, Low Income Housing Tax Credit,  
Home Investment Partnership Program)

##### U.S. Federal Assistance Programs

- ☐ Medicaid (not Medicare)
- ☐ SNAP (Food Stamps)
- ☐ Supplemental Security Income
- ☐ Federal Public Housing Assistance (Section 8)
- ☐ Low Income Home Energy Assistance
- ☐ Bureau of Indian Affairs General Assistance
- ☐ Temporary Assistance for Needy Families (TANF)
- ☐ Head Start (only if meeting income/qualifying standards)
- ☐ National School Lunch Program
- ☐ Tribal Administered Assistance for Needy Families
- ☐ VA Pension or VA Disability Pension
- ☐ Senior Citizen Housing Development Fund

- ☐ I AGREE TO ATTACH A COPY OF A STATEMENT OF BENEFITS (CURRENT OR PRIOR YEAR) OR LETTER OF PARTICIPATION OR PARTICIPATION DOCUMENT (BENEFIT CARD) OR OFFICIAL DOCUMENT SHOWING PARTICIPATION IN STATE, FEDERAL OR TRIBAL PROGRAM. OTZ WILL NOT RETAIN DOCUMENT.

#### ELIGIBILITY REQUIREMENTS

If you do not qualify for Lifeline based on the assistance programs listed on page one, then the following chart can be used to determine eligibility for Lifeline based solely on income. You may qualify if your household annual income is at or below 135% of the Federal Poverty Guidelines. A household is any individual or group of individuals who live together at the same address and share income and expenses. If the income amount for your household size is more than the amount shown on the chart below you do not qualify for Lifeline discount based solely on income.

Federal Poverty Guidelines - 135%

Household Size	1	2	3	4	5	6	7	8	More than 8
Alaska	\$9,883	\$26,541	\$33,399	\$40,257	\$47,115	\$53,973	\$60,831	\$67,689	Add \$6,868 for each

- ☐ I CERTIFY THAT MY TOTAL HOUSEHOLD INCOME IS AT OR BELOW THE 135% OF THE FEDERAL POVERTY GUIDELINES AND I ALSO CERTIFY THAT THIS IS HOW MANY PEOPLE LIVE IN MY HOUSEHOLD (required): \_\_\_\_\_

If your household qualifies based on the above income chart, attach a copy of the following applicable documents. If you provide documentation that does not cover a full year (such as a current paycheck stub), you must submit three (3) consecutive months of the same type of document from the previous 12 months.

- Prior year's state, federal or Tribal tax return
- Current income statement from an employer or paycheck stub
- Social Security statement of benefits
- Veteran's Administration statement of benefits
- Retirement/Pension statement of benefits
- Unemployment/Workmen's Compensation statement of benefits
- Federal/Tribal notice letter of participation in General Assistance
- Divorce decree
- Child support award
- Other official document containing income information

#### ACKNOWLEDGEMENT & CONSENT

Your name, phone number, address, and information contained in the application, as well as information associated with your Lifeline service may be provided to the Universal Service Administration Company, or USAC, in order to verify your household does not receive more than one Lifeline benefit. You will be denied Lifeline benefits if you fail to provide OTZ with consent to provide the specified information to USAC.

- ☐ I ACKNOWLEDGE AND CONSENT THAT OTZ PROVIDE MY INFORMATION TO USAC AS MENTIONED ABOVE.
- ☐ I AGREE TO ALLOW OTZ TO EXCHANGE MY INFORMATION WITH FEDERAL OR STATE AGENCIES TO VERIFY MY ELIGIBILITY TO PARTICIPATE IN THE LIFELINE PROGRAM.
- ☐ I AGREE NOT TO TRANSFER MY LIFELINE BENEFITS TO ANOTHER PERSON.
- ☐ I AGREE TO PROVIDE A NEW ADDRESS TO OTZ WITHIN 30 DAYS IF I MOVE TO A NEW ADDRESS.
- ☐ I AGREE TO NOTIFY OTZ WITHIN 30 DAYS IF, FOR ANY REASON, I OR MY HOUSEHOLD:
  - NO LONGER RECEIVE BENEFITS FROM FEDERAL OR STATE PROGRAMS THAT QUALIFY ME FOR LIFELINE.
  - IF MY ANNUAL HOUSEHOLD INCOME EXCEEDS THE FEDERAL POVERTY GUIDELINES AMOUNT LISTED ABOVE THAT QUALIFIED ME FOR THE LIFELINE PROGRAM.
  - RECEIVES MORE THAN ONE LIFELINE BENEFIT OR ANOTHER MEMBER OF MY HOUSEHOLD IS RECEIVING LIFELINE SERVICE.
- ☐ I ACKNOWLEDGE THAT I MAY BE REQUIRED TO RE-CERTIFY MY CONTINUED ELIGIBILITY FOR LIFELINE AND MY FAILURE TO RE-CERTIFY WILL RESULT IN DE-ENROLLMENT AND TERMINATION OF MY LIFELINE BENEFITS.
- ☐ I ACKNOWLEDGE THAT PROVIDING FALSE OR FRAUDULANT INFORMATION TO RECEIVE LIFELINE BENEFITS IS PUNISHABLE BY LAW.
- ☐ THE INFORMATION CONTAINED IN THIS APPLICATION IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE.

Billing Name Signature

Date

Print Beneficiary Name



According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0572-0031. The time required to complete this information collection is estimated to average 4 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.

<b>USDA-RUS</b>  <b>OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS</b>	<i>This data will be used by RUS to review your financial situation. Your response is required by 7 U.S.C. 901 et seq. and, subject to federal laws and regulations regarding confidential information, will be treated as confidential.</i> <b>BORROWER NAME</b> OTZ Telephone Cooperative, Inc.  (Prepared with Audited Data)	
<b>INSTRUCTIONS</b> -Submit report to RUS within 30 days after close of the period. For detailed instructions, see RUS Bulletin 1744-2. Report in whole dollars only.	<b>PERIOD ENDING</b> December, 2013	<b>BORROWER DESIGNATION</b> AK0516

**CERTIFICATION**

*We hereby certify that the entries in this report are in accordance with the accounts and other records of the system and reflect the status of the system to the best of our knowledge and belief.*  
**ALL INSURANCE REQUIRED BY 7 CFR PART 1788, CHAPTER XVII, RUS, WAS IN FORCE DURING THE REPORTING PERIOD AND RENEWALS HAVE BEEN OBTAINED FOR ALL POLICIES.**

**DURING THE PERIOD COVERED BY THIS REPORT PURSUANT TO PART 1788 OF 7CFR CHAPTER XVII**  
*(Check one of the following)*

☒ All of the obligations under the RUS loan documents have been fulfilled in all material respects.

☐ There has been a default in the fulfillment of the obligations under the RUS loan documents. Said default(s) is/are specifically described in the Telecom Operating Report

Douglas Neal

4/29/2014

DATE

**PART A. BALANCE SHEET**

ASSETS	BALANCE PRIOR YEAR	BALANCE END OF PERIOD	LIABILITIES AND STOCKHOLDERS' EQUITY	BALANCE PRIOR YEAR	BALANCE END OF PERIOD
<b>CURRENT ASSETS</b>			<b>CURRENT LIABILITIES</b>		
1. Cash and Equivalents	794,415	827,330	25. Accounts Payable	2,161,018	2,076,986
2. Cash-RUS Construction Fund	109,394	29,363	26. Notes Payable		
3. Affiliates:			27. Advance Billings and Payments	60,074	60,127
a. Telecom, Accounts Receivable			28. Customer Deposits	36,709	34,959
b. Other Accounts Receivable			29. Current Mat. L/T Debt	1,375,200	1,719,100
c. Notes Receivable	1,970,568	1,729,397	30. Current Mat. L/T Debt-Rur. Dev.		
4. Non-Affiliates:			31. Current Mat.-Capital Leases		
a. Telecom, Accounts Receivable	311,895	315,029	32. Income Taxes Accrued		
b. Other Accounts Receivable	633,967	422,210	33. Other Taxes Accrued		
c. Notes Receivable			34. Other Current Liabilities	1,993,059	434,700
5. Interest and Dividends Receivable			35. Total Current Liabilities (25 thru 34)	5,626,060	4,325,872
6. Material-Regulated	378,892	344,640	<b>LONG-TERM DEBT</b>		
7. Material-Nonregulated			36. Funded Debt-RUS Notes	4,348,612	3,690,376
8. Prepayments	85,557	86,410	37. Funded Debt-RTB Notes	1,498,765	1,477,317
9. Other Current Assets			38. Funded Debt-FFB Notes	936,684	751,110
10. Total Current Assets (1 Thru 9)	4,284,688	3,754,379	39. Funded Debt-Other	763,351	2,008,748
<b>NONCURRENT ASSETS</b>			40. Funded Debt-Rural Develop. Loan		
11. Investment in Affiliated Companies			41. Premium (Discount) on L/T Debt		
a. Rural Development			42. Recacquired Debt		
b. Nonrural Development	2,451,725	2,745,121	43. Obligations Under Capital Lease		
12. Other Investments			44. Adv. From Affiliated Companies		
a. Rural Development			45. Other Long-Term Debt		
b. Nonrural Development	355,158	533,376	46. Total Long-Term Debt (38 thru 45)	7,547,412	7,927,551
13. Nonregulated Investments			<b>OTHER LIAB. &amp; DEF. CREDITS</b>		
14. Other Noncurrent Assets			47. Other Long-Term Liabilities	296,233	296,233
15. Deferred Charges	17,896	23,834	48. Other Deferred Credits	17,096	23,834
16. Jurisdictional Differences			49. Other Jurisdictional Differences		
17. Total Noncurrent Assets (11 thru 16)	2,824,779	3,302,331	50. Total Other Liabilities and Deferred Credits (47 thru 49)	314,129	320,067
<b>PLANT, PROPERTY, AND EQUIPMENT</b>			<b>EQUITY</b>		
18. Telecom, Plant-In-Service	28,626,510	28,879,322	51. Cap. Stock Outstanding & Subscribed		
19. Property Held for Future Use			52. Additional Paid-In Capital		
20. Plant Under Construction	1,560,111	445,478	53. Treasury Stock		
21. Plant Adj., Nonop. Plant & Goodwill			54. Membership and Cap. Certificates	7,660	6,735
22. Less Accumulated Depreciation	17,714,726	17,611,296	55. Other Capital		
23. Net Plant (18 thru 21 less 22)	12,471,895	11,713,504	56. Patronage Capital Credits	5,830,009	5,830,009
24. TOTAL ASSETS (10+17+23)			57. Retained Earnings or Margins	256,092	359,980
			58. Total Equity (51 thru 57)	6,093,761	6,196,724
			59. TOTAL LIABILITIES AND EQUITY (35+46+60+58)	19,581,362	18,770,214
	19,581,362	18,770,214			

Total Equity = 33.01% % of Total Assets

Page 1 of 6

REDACTED - FOR PUBLIC INSPECTION

USDA-RUS		BORROWER DESIGNATION	
OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS		AK0516	
		PERIOD ENDING	
INSTRUCTIONS- See RUS Bulletin 1744-2		December, 2013	
PART B. STATEMENTS OF INCOME AND RETAINED EARNINGS OR MARGINS			
ITEM	PRIOR YEAR	THIS YEAR	
1. Local Network Services Revenues	913,157	928,372	
2. Network Access Services Revenues	5,767,842	5,661,718	
3. Long Distance Network Services Revenues			
4. Carrier Billing and Collection Revenues	85,357	117,330	
5. Miscellaneous Revenues	57,958	46,548	
6. Uncollectible Revenues	18,105	23,745	
7. Net Operating Revenues (1 thru 6 less 8)	6,806,209	6,730,223	
8. Plant Specific Operations Expense	2,769,428	2,632,040	
9. Plant Nonspecific Operations Expense (Excluding Depreciation & Amortization)	580,941	667,230	
10. Depreciation Expense	1,346,252	1,392,579	
11. Amortization Expense			
12. Customer Operations Expense	306,959	506,903	
13. Corporate Operations Expense	1,577,313	1,421,563	
14. Total Operating Expenses (8 thru 13)	6,580,893	6,620,315	
15. Operating Income or Margins (7 less 14)	225,316	109,908	
16. Other Operating Income and Expenses	(173,831)		
17. State and Local Taxes			
18. Federal Income Taxes			
19. Other Taxes	107,805	107,721	
20. Total Operating Taxes (17+18+19)	107,805	107,721	
21. Net Operating Income or Margins (15+16-20)	(56,320)	2,187	
22. Interest on Funded Debt	460,931	450,493	
23. Interest Expense - Capital Leases			
24. Other Interest Expense	4,487		
25. Allowance for Funds Used During Construction	70,000	80,000	
26. Total Fixed Charges (22+23+24-25)	395,418	370,493	
27. Nonoperating Net Income	837,554	370,048	
28. Extraordinary Items			
29. Jurisdictional Differences			
30. Nonregulated Net Income	110,761	101,827	
31. Total Net Income or Margins (21+27+28+29+30-26)	496,577	103,569	
32. Total Taxes Based on Income			
33. Retained Earnings or Margins Beginning-of-Year	(241,095)	256,411	
34. Miscellaneous Credits Year-to-Date	610		
35. Dividends Declared (Common)			
36. Dividends Declared (Preferred)			
37. Other Debits Year-to-Date			
38. Transfers to Patronage Capital			
39. Retained Earnings or Margins End-of-Period [(31+33+34) - (35+36+37+38)]	256,092	359,980	
40. Patronage Capital Beginning-of-Year	5,830,009	5,830,009	
41. Transfers to Patronage Capital			
42. Patronage Capital Credits Retired			
43. Patronage Capital End-of-Year (40+41-42)	5,830,009	5,830,009	
44. Annual Debt Service Payments	1,599,462	1,719,124	
45. Cash Ratio [(14+20-10-11) / 7]	0.7849	0.7928	
46. Operating Accrual Ratio [(14+20+26) / 7]	1.0408	1.0547	
47. TIER [(31+28) / 26]	2.2558	1.2795	
48. DSCR [(31+28+10+11) / 44]	1.3994	1.0858	



USDA-RUS

# OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS

BORROWER DESIGNATION

AK0610

PERIOD ENDED

December, 2013

INSTRUCTIONS - See RUS Bulletin 1744-2

## Part C. SUBSCRIBER (ACCESS LINE), ROUTE MILE, & HIGH SPEED DATA INFORMATION

EXCHANGE	1. RATES		2. SUBSCRIBERS (ACCESS LINES)			3. ROUTE MILES	
	B-1 (a)	R-1 (b)	BUSINESS (a)	RESIDENTIAL (b)	TOTAL (c)	TOTAL (including fiber) (a)	FIBER (b)
Amblar	24.50	18.55	47	40	87	4.13	
Buckland	24.80	18.55	62	81	113	1.71	
Deering	24.80	18.55	44	27	71	2.47	
Klana	24.60	18.55	57	54	111	2.21	
Kvellingna	24.50	18.55	58	37	95	1.38	
Kohuk	24.50	18.55	39	17	56	1.00	
Kotzebue	24.50	18.55	763	518	1,271	27.52	
Noatak	24.50	18.55	82	80	132	2.83	
Noorvik	24.50	18.55	57	68	125	4.03	
Red Dog	24.50	18.55	0	0	0	1.00	
Selawik	24.50	18.55	85	72	167	9.18	
Shungnak	24.50	18.55	43	32	75	3.05	
MobileWireless					0		
Route Mileage Outside Exchange Area						0.00	0.00
Total			1,318	896	2,312	60.48	0.00
No. Exchanges	12						



USDA-RUS							BORROWER DESIGNATION AK0516	
OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS							PERIOD ENDED December, 2013	
INSTRUCTIONS - See RUS Bulletin 1744-2								
Part C. SUBSCRIBER (ACCESS LINE), ROUTE MILE, & HIGH SPEED DATA INFORMATION								
4. BROADBAND SERVICE								
Details on Least Expensive Broadband Service								
EXCHANGE	No. Access Lines with BB available (a)	No Of Broadband Subscribers (b)	Number Of Subscribers (c)	Advertised Download Rate (Kbps) (d)	Advertised Upload Rate (Kbps) (e)	Price Per Month (f)	StandAlone/Pckg (g)	Type Of Technology (h)
Ambler	84	17	17	256	256	45.00	StandAlone	DSL
Buckland	125	28	29	256	256	45.00	StandAlone	DSL
Deering	76	21	21	256	256	45.00	StandAlone	DSL
Kiana	118	38	38	256	256	45.00	StandAlone	DSL
Kivalina	104	39	39	256	256	45.00	StandAlone	DSL
Kohuk	59	14	14	256	256	45.00	StandAlone	DSL
Kotzebue	1,338	493	171	256	256	45.00	Package	DSL
Nalek	141	35	25	256	256	45.00	StandAlone	DSL
Noorvik	143	30	19	256	256	45.00	StandAlone	DSL
Red Dog	0	0	0	256	256	45.00	StandAlone	DSL
Selawik	195	42	28	256	256	45.00	StandAlone	DSL
Shungnak	70	32	18	256	256	45.00	StandAlone	DSL
Total	2,462	769						

<b>USDA-RUS</b> <b>OPERATING REPORT FOR</b> <b>TELECOMMUNICATIONS BORROWERS</b>			<b>BORROWER DESIGNATION</b> AK0516 <b>PERIOD ENDING</b> December, 2013		
INSTRUCTIONS- See RUS Bulletin 1744-2					
<b>PART D. SYSTEM DATA</b>					
1. No. Plant Employees	2. No. Other Employees	3. Square Miles Served	4. Access Lines per Square Mile	5. Subscribers per Route Mile	
14	11	44,000	.05	38.22	
<b>PART E. TOLL DATA</b>					
1. Study Area ID Code(s) a. 613019 b. c. d. e. f. g. h. i. j.		2. Types of Toll Settlements (Check one) <div style="display: flex; justify-content: space-between;"> <div>           Interstate: <input type="checkbox"/> Average Schedule            Intrastate: <input type="checkbox"/> Average Schedule         </div> <div> <input checked="" type="checkbox"/> Cost Based  <input checked="" type="checkbox"/> Cost Based         </div> </div>			
<b>PART F. FUNDS INVESTED IN PLANT DURING YEAR</b>					
1. RUS, RTB, & FFB Loan Funds Expended					480,520
2. Other Long-Term Loan Funds Expended					
3. Funds Expended Under RUS Interim Approval					
4. Other Short-Term Loan Funds Expended					
5. General Funds Expended (Other than Interim)					65,699
6. Salvaged Materials					
7. Contribution in Aid to Construction					0
8. Gross Additions to Telecom. Plant (1 thru 7)					554,227
<b>PART G. INVESTMENTS IN AFFILIATED COMPANIES</b>					
INVESTMENTS  (a)	CURRENT YEAR DATA		CUMULATIVE DATA		
	Investment This Year  (b)	Income/Loss This Year  (c)	Cumulative Investment To Date  (d)	Cumulative Income/Loss To Date  (e)	Current Balance  (f)
1. Investment in Affiliated Companies - Rural Development	0	0	0	0	0
2. Investment in Affiliated Companies - Nonrural Development	0	368,396	1,700,000	1,045,121	2,745,121

**USDA-RUS**  
**OPERATING REPORT FOR**  
**TELECOMMUNICATIONS BORROWERS**

BORROWER DESIGNATION

AK0516

PERIOD ENDING

December, 2013

**PART H. CURRENT DEPRECIATION RATES**

Are corporation's depreciation rates approved by the regulatory authority with jurisdiction over the provision of telephone services? (Check one)

☒ YES ☐ NO

EQUIPMENT CATEGORY	DEPRECIATION RATE
1. Land and support assets - Motor Vehicles	10.59%
2. Land and support assets - Aircraft	
3. Land and support assets - Special purpose vehicles	
4. Land and support assets - Garage and other work equipment	5.21%
5. Land and support assets - Buildings	2.51%
6. Land and support assets - Furniture and Office equipment	5.71%
7. Land and support assets - General purpose computers	5.46%
8. Central Office Switching - Digital	5.74%
9. Central Office Switching - Analog & Electro-mechanical	
10. Central Office Switching - Operator Systems	
11. Central Office Transmission - Radio Systems	
12. Central Office Transmission - Circuit equipment	8.57%
13. Information origination/termination - Station apparatus	
14. Information origination/termination - Customer premises wiring	
15. Information origination/termination - Large private branch exchanges	
16. Information origination/termination - Public telephone terminal equipment	
17. Information origination/termination - Other terminal equipment	
18. Cable and wire facilities - Poles	2.11%
19. Cable and wire facilities - Aerial cable - Metal	4.22%
20. Cable and wire facilities - Aerial cable - Fiber	
21. Cable and wire facilities - Underground cable - Metal	
22. Cable and wire facilities - Underground cable - Fiber	
23. Cable and wire facilities - Buried cable - Metal	5.60%
24. Cable and wire facilities - Buried cable - Fiber	
25. Cable and wire facilities - Conduit systems	5.60%
26. Cable and wire facilities - Other	

USDA-RUS		BORROWER DESIGNATION	
OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS		AK0516	
INSTRUCTIONS -- See help in the online application.		PERIOD ENDED December, 2013	
PART I -- STATEMENT OF CASH FLOWS			
1.	Beginning Cash (Cash and Equivalents plus RUS Construction Fund)	903,809	
CASH FLOWS FROM OPERATING ACTIVITIES			
2.	Net Income	103,569	
Adjustments to Reconcile Net Income to Net Cash Provided by Operating Activities			
3.	Add: Depreciation	1,392,579	
4.	Add: Amortization	0	
6.	Other (Explain)		
Changes in Operating Assets and Liabilities			
8.	Decrease/(Increase) in Accounts Receivable	208,623	
7.	Decrease/(Increase) in Materials and Inventory	34,252	
8.	Decrease/(Increase) in Prepayments and Deferred Charges	(6,791)	
9.	Decrease/(Increase) in Other Current Assets	0	
10.	Increase/(Decrease) in Accounts Payable	(84,032)	
11.	Increase/(Decrease) in Advance Billings & Payments	53	
12.	Increase/(Decrease) in Other Current Liabilities	(1,558,359)	
13.	Net Cash Provided/(Used) by Operations	89,894	
CASH FLOWS FROM FINANCING ACTIVITIES			
14.	Decrease/(Increase) in Notes Receivable	241,171	
15.	Increase/(Decrease) in Notes Payable	0	
16.	Increase/(Decrease) in Customer Deposits	(1,750)	
17.	Net Increase/(Decrease) in Long Term Debt (Including Current Maturities)	724,039	
18.	Increase/(Decrease) in Other Liabilities & Deferred Credits	5,938	
19.	Increase/(Decrease) in Capital Stock, Paid-In Capital, Membership and Capital Certificates & Other Capital	(925)	
20.	Less: Payment of Dividends	0	
21.	Less: Patronage Capital Credits Retired	0	
22.	Other (Explain)		
23.	Net Cash Provided/(Used) by Financing Activities	968,473	
CASH FLOWS FROM INVESTING ACTIVITIES			
24.	Net Capital Expenditures (Property, Plant & Equipment)	861,821	
25.	Other Long-Term Investments	(471,614)	
26.	Other Noncurrent Assets & Jurisdictional Differences	0	
27.	Other (Explain) Balance to Ending Cash	(1,495,690)	
28.	Net Cash Provided/(Used) by Investing Activities	(1,105,483)	
29.	Net Increase/(Decrease) in Cash	(47,116)	
30.	Ending Cash	856,693	

Revision Date 2010

USDA-RUS  OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS	BORROWER DESIGNATION  AK0516
INSTRUCTIONS - See RUS Bulletin 1744-2	PERIOD ENDED December, 2013
NOTES TO THE OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS	

USDA-RUS OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS	BORROWER DESIGNATION AK0516
INSTRUCTIONS - See RUS Bulletin 1744-2	PERIOD ENDED December, 2013
CERTIFICATION LOAN DEFAULT NOTES TO THE OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS	